

Rebecca Terry vs County of Milwaukee, et al.

17-CV-01112

Transcript of the Testimony of:

JULIE K. SHANAHAN

April 17, 2018



1 IN THE UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF WISCONSIN

3 -----
4 REBECCA TERRY,

5 Plaintiff,

6 vs.

Case No. 17-CV-01112

7 COUNTY OF MILWAUKEE, et al.,

8 Defendants.
9 -----

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13 Deposition of JULIE K. SHANAHAN

14 Tuesday, April 17th, 2018

15 10:02 a.m.

16 at

17 LEIB KNOTT GAYNOR
18 219 North Milwaukee Street
19 Milwaukee, Wisconsin

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22
23
24 Reported by Sandra K. Nelson

25 Registered Professional Reporter

<p>1 Deposition of JULIE K. SHANAHAN, a 2 witness in the above-entitled action, taken at 3 the instance of the Plaintiff, pursuant to the 4 Federal Rules of Civil Procedure, pursuant to 5 Notice, before Sandra K. Nelson, RPR and Notary 6 Public, State of Wisconsin, at LEIB KNOTT GAYNOR, 7 219 North Milwaukee Street, Milwaukee, Wisconsin, 8 53202, on the 17th day of April, 2018 commencing 9 at 10:02 a.m. and concluding at 11:44 a.m.</p> <p>10 11 12 A P P E A R A N C E S: 13 LOVEY & LOVEY, by 14 Ms. Aisha Davis 15 311 North Aberdeen Street, 3rd Floor 16 Chicago, Illinois 60607 17 Appeared on behalf of Plaintiff; 18 LEIB KNOTT GAYNOR LLC, by 19 Mr. Randy Arnold 20 219 North Milwaukee Street, Suite 710 21 Milwaukee, Wisconsin 53202 22 Appeared on behalf of County of 23 Milwaukee and David A. Clarke, Jr., 24 Officer Brian Wenzel, Jane and John 25 Doe, Unknown Employees of Milwaukee County Jail, Jane and John Doe, Unknown Jail Supervisors;</p> <p>HINSHAW & CULBERTSON LLP, by Ms. Mollie T. Kugler 100 East Wisconsin Avenue, Suite 2600 Milwaukee, Wisconsin 53202 Appeared on behalf of Armor Correctional Health Services.</p>	<p>Page 2</p> <p>1 TRANSCRIPT OF PROCEEDINGS 2 JULIE K. SHANAHAN, called as a witness 3 herein, having been first duly sworn on oath, was 4 examined and testified as follows: 5 EXAMINATION 6 BY MS. DAVIS: 7 Q Good morning. 8 A Good morning. 9 Q Could you please state and spell your name for 10 the record. 11 A Julie K. Shanahan; J-U-L-I-E, middle initial "K." 12 S-H-A-N-A-H-A-N. 13 Q And have you been deposed before? 14 A I've given court testimony, but I've never given 15 a deposition. 16 Q When did you give court testimony? 17 A It was for different OWI cases and then also for 18 the inquest for Milwaukee County Jail with a 19 death in custody. 20 Q When was that inquest? 21 A Two years ago maybe. 22 Q Were you working at the jail at that time? 23 A Yeah. 24 Q So just to go over a few rules for the 25 deposition, you can take a break any time you</p>
<p>Page 3</p> <p>1 E X A M I N A T I O N 2 3 BY MS. DAVIS: 4 5 6 7 8 9 10 E X H I B I T S 11 EXHIBIT NO. PAGE IDENTIFIED 12 Exh. 1 Detention Services, Bureau Logs, 19 13 Records and Reports 14 Exh. 2 Detention Services, Bureau Logs, 24 15 Records and Reports 16 Exh. 3 Jail log 47 17 Exh. 4 Incident report 60 18 19 (Original exhibits attached to original 20 transcript. Copies of exhibits attached to 21 copies of transcripts.) 22 23 24 25</p>	<p>Page 5</p> <p>1 need to. The only thing is, if I ask a question, 2 just give me an answer before we take the break. 3 Otherwise, whenever you want to take a break to 4 stretch your legs or whatever, that's all good. 5 We should agree to speak one at a 6 time so that everything can be taken down 7 accurately and I don't cut you off, you don't cut 8 me off, that kind of thing. 9 All the answers need to be verbal 10 so no nodding, no shaking your head. I also have 11 to make sure I don't do that either. And if you 12 don't understand a question, let me know, I'll 13 rephrase it. And if you answer the question, I'm 14 going to assume that you understood what I was 15 asking, and we'll just keep going from there. 16 And then just in terms of what you 17 told us earlier about testifying about an -- you 18 said inquisition? 19 A Inquest. 20 Q Inquest. Was there any other time you gave 21 testimony in a court? 22 A For OWI cases because I was an Intoximeter 23 operator. 24 Q What is OWI? 25 A Operating while under the influence.</p>

<p style="text-align: right;">Page 6</p> <p>1 Q I did not know that acronym yet. Have you ever 2 been a defendant in a case? 3 A No. 4 Q Leading up to today's deposition, did you review 5 any documents? 6 A Just the one that I was provided. 7 Q Was that the incident report? 8 A Yes. 9 Q And you didn't look at anything else? 10 A No. 11 Q Did you speak to anyone about the deposition? 12 A No. 13 Q You're currently employed at the Milwaukee County 14 Jail, right? 15 A No, I am not. I no longer work there since 16 February of this year. 17 Q Where do you work now? 18 A I'm working for Delaware North Companies. 19 MR. ARNOLD: What was that? 20 THE WITNESS: Delaware North Companies. 21 MR. ARNOLD: Thank you. 22 BY MS. DAVIS: 23 Q So before leaving in February 2018, how long were 24 you working at the jail? 25 A Eight years.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q And before Lowe's, where did you work? 2 A Home Depot. I've had -- you should have told me 3 to bring my resume if you needed the whole thing. 4 Q Just getting a little bit of background 5 information that's all. For your job at Home 6 Depot, how long did you work there? 7 A Six months, something like that. 8 Q And that was back in '06? 9 A Probably or '05. I don't know. 10 Q Do you remember what you were doing before you 11 worked at Home Depot? 12 A A variety of sales and marketing, merchandising, 13 management jobs for wholesale growers. 14 Q And what's your highest level of education? 15 A Bachelor's degree in communications. 16 Q Where did you go? 17 A Carroll University. 18 Q Did you say Curry? 19 A Carroll. 20 Q Carroll. Two Rs, two Ls? 21 A Yes. 22 Q What year did you graduate? 23 A 1981. 24 Q Remind me again how long you worked at the 25 Milwaukee County Jail.</p>
<p style="text-align: right;">Page 7</p> <p>1 Q And what was your highest rank? 2 A Lieutenant. 3 Q In March of 2014, what was your rank? 4 A Correctional officer. 5 Q Before working at the jail, where did you work? 6 A Goodwill Industries in retail. 7 Q And how long did you work there? 8 A Probably four months, because then I got hired by 9 Cook County. 10 Q Before the Goodwill Industries position, where 11 did you work? 12 A Delaware North Company. And prior to that, 13 Scott's Merchandise -- or Scott's Lawn Care -- 14 not lawn care. Scott's Miracle Grow Company. 15 Q And before Scott's Miracle Grow, where did you 16 work? 17 A Lowe's. 18 Q Lowe's. Okay. And about what time -- or about 19 when did you work at Lowe's -- what year? 20 A 2006/2007, something like that. 21 Q And at Scott's Miracle Grow, was that about 2007 22 as well? 23 A 2008. 24 Q And the Delaware North Company? 25 A That was 2009 and 2010. That was part time.</p>	<p style="text-align: right;">Page 9</p> <p>1 A Eight years. 2 Q So that was about 2010 to 2018? 3 A Yes. 4 Q Prior to being a CO at the Milwaukee County Jail, 5 did you have any other law enforcement jobs? 6 A No. 7 Q Did you apply to become a CO at the Milwaukee 8 County Jail? 9 A Yes. 10 Q Was it just an open application or did you hear 11 about it from someone else? 12 A It was an open application. 13 Q Did you apply only once? 14 A Yes. 15 Q Prior to working at the Milwaukee County Jail, 16 did you have to undergo any training to become a 17 CO? 18 A Well, when I got hired, there was six weeks of 19 training. 20 Q There was no academy or anything like that, it 21 was just the six weeks of training? 22 A It was the Sheriff's Training Academy. 23 Q Was that specific for becoming a CO or was 24 that -- 25 A Yes. And it's state mandated to be certified as</p>

<p style="text-align: right;">Page 10</p> <p>1 a correctional officer.</p> <p>2 Q What types of training did you have in those six</p> <p>3 weeks?</p> <p>4 A Everything and anything to do with being a</p> <p>5 correctional officer from learning communication</p> <p>6 skills, how to deal with mentally ill inmates,</p> <p>7 how to write reports, how to defend yourself if</p> <p>8 you got attacked by an inmate, laws, statutes,</p> <p>9 all that stuff.</p> <p>10 Q Was there any specific training for dealing with</p> <p>11 health care, whether it's mental health or --</p> <p>12 MS. KUGLER: Object to form.</p> <p>13 THE WITNESS: There was a section on</p> <p>14 medical or mental health care. It was pretty</p> <p>15 generic because we're not medical people.</p> <p>16 BY MS. DAVIS:</p> <p>17 Q For these trainings were you given any written</p> <p>18 paperwork to look over or was it all just for</p> <p>19 instruction?</p> <p>20 A There were stacks and stacks of paperwork that we</p> <p>21 got.</p> <p>22 Q Were there any tests --</p> <p>23 A Absolutely.</p> <p>24 Q Was it a test for every subject area?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 12</p> <p>1 thing.</p> <p>2 Q Was there any subsequent training on how to</p> <p>3 address any medical or health issues after the</p> <p>4 six-week academy?</p> <p>5 MS. KUGLER: Objection; form.</p> <p>6 THE WITNESS: I don't remember.</p> <p>7 BY MS. DAVIS:</p> <p>8 Q About how long was the training on health care at</p> <p>9 the academy?</p> <p>10 A I don't remember.</p> <p>11 Q Was there any training conducted on how to</p> <p>12 maintain jail logs while you were at the academy?</p> <p>13 A Yes.</p> <p>14 Q And was there any subsequent training on that?</p> <p>15 A Once we got out of the academy?</p> <p>16 Q Mm-hmm.</p> <p>17 A No.</p> <p>18 Q Was there any specialized training for different</p> <p>19 positions that you could have as a CO within the</p> <p>20 jail?</p> <p>21 A Yes.</p> <p>22 Q What were those trainings?</p> <p>23 A You could learn how to do fingerprinting and</p> <p>24 fingerprint identification, jail records,</p> <p>25 classification.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q So was there a test on writing reports?</p> <p>2 A I would assume so, but I don't remember for sure.</p> <p>3 Q And were there tests for the health instructions</p> <p>4 you were given or training you were given?</p> <p>5 MS. KUGLER: Objection; form.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MS. DAVIS:</p> <p>8 Q And in the health training, was that more so in</p> <p>9 terms of how the COs interacted with the nursing</p> <p>10 staff and medical staff?</p> <p>11 MS. KUGLER: Objection; form.</p> <p>12 MS. DAVIS: I'll rephrase it.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q When I say "medical" or any kind of training</p> <p>15 around medical or mental health, what do you</p> <p>16 understand that to mean?</p> <p>17 A Well, the mental health is more how to</p> <p>18 communicate with people who have mental health</p> <p>19 issues.</p> <p>20 Q Okay.</p> <p>21 A The medical was more general things, but nothing</p> <p>22 specific about how to treat people.</p> <p>23 It was more how to respond to them</p> <p>24 or to pay attention if they were complaining</p> <p>25 about someone, who you called, that type of</p>	<p style="text-align: right;">Page 13</p> <p>1 Q Did you go for any of that specialized training?</p> <p>2 A Fingerprint identification.</p> <p>3 Q Was that more so used for intakes at the jail?</p> <p>4 A Yes.</p> <p>5 Q Was that a one-time training?</p> <p>6 A Yes.</p> <p>7 Q Did you have any other specialized training?</p> <p>8 A Crisis intervention training. That was from the</p> <p>9 National -- National Alliance of Mental Health.</p> <p>10 Q Is that a training that all the COs went to?</p> <p>11 A No.</p> <p>12 Q How were you selected to go through it as opposed</p> <p>13 to others?</p> <p>14 A We had to put in a matter of stating that we were</p> <p>15 interested in doing it. I had worked on third</p> <p>16 shift with the special needs inmates, so it was</p> <p>17 kind of a natural step.</p> <p>18 Q And what would be considered third shift -- which</p> <p>19 hours?</p> <p>20 A Ten o'clock to six a.m.</p> <p>21 Q Were you working at the jail when Armor</p> <p>22 Correctional Health began its contract with the</p> <p>23 jail?</p> <p>24 A Yes.</p> <p>25 Q When they started taking over the health care at</p>

<p style="text-align: right;">Page 14</p> <p>1 the jail, was there any training for how to</p> <p>2 interact with the medical staff now that Armor</p> <p>3 was in the jail?</p> <p>4 MR. ARNOLD: Objection; form and</p> <p>5 foundation.</p> <p>6 THE WITNESS: No.</p> <p>7 MS. KUGLER: Join.</p> <p>8 BY MS. DAVIS:</p> <p>9 Q So when they joined, did anything change in terms</p> <p>10 of your interactions in terms of the medical</p> <p>11 professionals?</p> <p>12 A No.</p> <p>13 MR. ARNOLD: You need to wait until she</p> <p>14 finishes the question. It's very hard for the</p> <p>15 court reporter. It's hard to do. We do it in</p> <p>16 conversation all the time.</p> <p>17 BY MS. DAVIS:</p> <p>18 Q When Armor did come into the jail, was there any</p> <p>19 change in the medical staff that you noticed?</p> <p>20 MS. KUGLER: Objection; form.</p> <p>21 THE WITNESS: That really wasn't my</p> <p>22 area or my concern really because I was just an</p> <p>23 officer. And even as a lieutenant, we didn't get</p> <p>24 involved in staffing.</p> <p>25</p>	<p style="text-align: right;">Page 16</p> <p>1 that you talked about from the National Alliance</p> <p>2 of Mental Health?</p> <p>3 A I don't remember.</p> <p>4 Q Do you know if it was before or after Armor</p> <p>5 started working with the jail?</p> <p>6 A My best guess would be it was before.</p> <p>7 Q And I'm still trying to remember the term that</p> <p>8 you used for the prior testimony that you had in</p> <p>9 court. It was the --</p> <p>10 A Intoximeter operator.</p> <p>11 Q I'm sorry?</p> <p>12 A I'm an Intoximeter operator.</p> <p>13 Q I meant where you said there was a death in the</p> <p>14 jail.</p> <p>15 A It was an inquest. My involvement was, "Were you</p> <p>16 there that day?"</p> <p>17 "Yes."</p> <p>18 "Did you know anything?"</p> <p>19 "No."</p> <p>20 Q Was that a death that happened while Armor was</p> <p>21 working at the jail?</p> <p>22 A Yes.</p> <p>23 Q Do you remember who the inmate was that died?</p> <p>24 A Terrill Thomas.</p> <p>25 Q Were you there the day that he died?</p>
<p style="text-align: right;">Page 15</p> <p>1 BY MS. DAVIS:</p> <p>2 Q So when you started working at the jail, you were</p> <p>3 a CO. How long were you a CO?</p> <p>4 A 2014. I was promoted later.</p> <p>5 Q And is it directly from being a CO to a</p> <p>6 lieutenant?</p> <p>7 A Yes, that's the next step.</p> <p>8 Q Are there any other steps between or...</p> <p>9 A No.</p> <p>10 Q Are there any steps after lieutenant?</p> <p>11 A Captain.</p> <p>12 Q When you became a lieutenant, was there any other</p> <p>13 training that you had to go through?</p> <p>14 A Nothing formal.</p> <p>15 Q What were the informal trainings?</p> <p>16 A Working with another lieutenant to learn the</p> <p>17 duties and responsibilities.</p> <p>18 Q What were the new duties that you had?</p> <p>19 A Just talking about supervising employees and</p> <p>20 reviewing their jail logs, that type of thing,</p> <p>21 but nothing -- there wasn't much change.</p> <p>22 It was just more being directly</p> <p>23 involved in the day-to-day supervising the</p> <p>24 officers.</p> <p>25 Q When did you attend the mental health training</p>	<p style="text-align: right;">Page 17</p> <p>1 A Not that I remember.</p> <p>2 Q And you said that was about two years ago. So in</p> <p>3 2016?</p> <p>4 A I think so.</p> <p>5 Q Do you know where in the jail he died?</p> <p>6 A In the cell. In the disciplinary housing unit.</p> <p>7 Q As a CO, were there specific areas of the jail</p> <p>8 that you worked in or could you work in any part</p> <p>9 of the jail?</p> <p>10 A Everyone was given an assignment every day they</p> <p>11 worked and it varied.</p> <p>12 Q Okay. Did you ever work in the SMU?</p> <p>13 A Occasionally.</p> <p>14 Q Was there any additional training that you needed</p> <p>15 to go through to work in the SMU?</p> <p>16 A No.</p> <p>17 Q Did you interact with medical staff more in the</p> <p>18 SMU as opposed to other areas of the jail?</p> <p>19 A Yes.</p> <p>20 Q Did you only ever work the third shift while you</p> <p>21 were at the jail?</p> <p>22 MS. KUGLER: Objection; form.</p> <p>23 THE WITNESS: No.</p> <p>24 BY MS. DAVIS:</p> <p>25 Q Was it a rotating schedule?</p>

<p style="text-align: right;">Page 18</p> <p>1 A No.</p> <p>2 Q Okay. What other -- sorry. I'm just not really</p> <p>3 familiar about how the schedules are set.</p> <p>4 So how did that happen? What was</p> <p>5 the process of setting your schedule while you</p> <p>6 were a CO?</p> <p>7 A When I first started? We were given the option</p> <p>8 of selecting a shift we wanted to work, and then</p> <p>9 after that, it was based on staffing needs when</p> <p>10 people got moved around.</p> <p>11 Q You mentioned that you received some training on</p> <p>12 records and record keeping while you were at the</p> <p>13 academy, right?</p> <p>14 A Limited. I was not a records officer.</p> <p>15 Q Is that a specialized position?</p> <p>16 A Absolutely.</p> <p>17 MS. DAVIS: I'm going to have this</p> <p>18 marked.</p> <p>19 (Exhibit 1 was marked for</p> <p>20 identification.)</p> <p>21 BY MS. DAVIS:</p> <p>22 Q I'm handing you what's been marked as Exhibit 1.</p> <p>23 I'll give you a little bit of time to look</p> <p>24 through it if you want to.</p> <p>25 A (Witness reviewing document.)</p>	<p style="text-align: right;">Page 20</p> <p>1 MS. KUGLER: Objection; form.</p> <p>2 THE WITNESS: I don't remember.</p> <p>3 BY MS. DAVIS:</p> <p>4 Q And you said you had access to this document if</p> <p>5 you ever wanted to see the revised version?</p> <p>6 A Yes.</p> <p>7 Q During the academy, were you trained on</p> <p>8 maintaining logs, records, and reports?</p> <p>9 A Yes.</p> <p>10 Q Was that -- strike that.</p> <p>11 Were those logs, records and</p> <p>12 reports something that you had to have approved</p> <p>13 by a supervisor or just something that was</p> <p>14 routine that didn't have to be approved?</p> <p>15 MR. ARNOLD: Object to form and</p> <p>16 foundation.</p> <p>17 MS. KUGLER: Join.</p> <p>18 THE WITNESS: At the academy or</p> <p>19 during --</p> <p>20 MS. DAVIS: During your time as a CO.</p> <p>21 THE WITNESS: Jail logs, no. If you</p> <p>22 had to write an incident report, yes. You</p> <p>23 submitted it to your direct supervisor,</p> <p>24 lieutenant, and they approved it or sent it back</p> <p>25 and said fix it.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q Have you ever seen this document before?</p> <p>2 A Yes.</p> <p>3 Q Was there any training that you had on this</p> <p>4 Detention Services, Bureau Logs, Records and</p> <p>5 Reports?</p> <p>6 A It would have been in the initial training at the</p> <p>7 academy, and then we had access to anything we</p> <p>8 wanted to look up if needed.</p> <p>9 Q Is this an area -- I'm sorry. Strike that.</p> <p>10 Is this something that you would</p> <p>11 have been tested on in the academy?</p> <p>12 MR. ARNOLD: I'm going to object to the</p> <p>13 question.</p> <p>14 It's obvious from the document</p> <p>15 that she couldn't have received it during her</p> <p>16 training because it was revised in October of</p> <p>17 2014, which was well after the training so...</p> <p>18 THE WITNESS: I don't know.</p> <p>19 BY MS. DAVIS:</p> <p>20 Q Was there ever a test on record keeping or</p> <p>21 reporting when you were at the academy?</p> <p>22 A I don't remember.</p> <p>23 Q Did you receive some version of this document,</p> <p>24 whether it was the original or the revised, do</p> <p>25 you remember?</p>	<p style="text-align: right;">Page 21</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Okay. So I'm looking at the bottom of the first</p> <p>3 page, which is five at the bottom.</p> <p>4 The log entries, was there ever --</p> <p>5 we'll just talk about log entries. Was there</p> <p>6 ever any review process to make sure they were</p> <p>7 done correctly?</p> <p>8 MR. ARNOLD: At any time?</p> <p>9 MS. DAVIS: While you were a CO.</p> <p>10 THE WITNESS: Lieutenants were supposed</p> <p>11 to check the logs, to review them to make sure</p> <p>12 that they were putting everything in that needed</p> <p>13 to be entered in.</p> <p>14 BY MS. DAVIS:</p> <p>15 Q Okay. And when you were a lieutenant, did you</p> <p>16 have to review CO logs?</p> <p>17 A Yes.</p> <p>18 Q Was that done daily?</p> <p>19 A Yes.</p> <p>20 Q And then turning to page seven, you mentioned</p> <p>21 that there are incident reports that are written</p> <p>22 up and have to be reviewed by lieutenants, right?</p> <p>23 A Correct.</p> <p>24 Q When are those incident reports written?</p> <p>25 A If there's a medical emergency, if there's a</p>

<p style="text-align: right;">Page 22</p> <p>1 fight, if there's use of force. But that was</p> <p>2 much more involved with the report.</p> <p>3 I'm trying to think of what else.</p> <p>4 I mean, other people, if they were transporting</p> <p>5 people to -- or providing security on a hospital</p> <p>6 run, they wrote a short report saying that they</p> <p>7 went to the hospital with so and so and watched</p> <p>8 over the person.</p> <p>9 Chapter 51 reports were a</p> <p>10 different thing that the deputies had to take</p> <p>11 care of because that was a legal document.</p> <p>12 Q Okay. And when a report had to be written, how</p> <p>13 did you determine what CO would write the report?</p> <p>14 A Whoever was the CO assigned to that post or was</p> <p>15 the first responder or however -- whatever the</p> <p>16 incident was.</p> <p>17 Q Okay. And is it just the CO who wrote the report</p> <p>18 and the lieutenant who reviewed the report?</p> <p>19 A For a general one, yes. Sometimes if it was</p> <p>20 quite involved, like a use of force, they would</p> <p>21 get the captains involved.</p> <p>22 But for this type of thing, no, it</p> <p>23 would just have been the lieutenant.</p> <p>24 Q And when you say "this type of thing," you mean</p> <p>25 the incident report related to this case?</p>	<p style="text-align: right;">Page 24</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q I take that back. You had medical training in</p> <p>4 the academy, and you said you went to the crisis</p> <p>5 intervention training?</p> <p>6 A Correct.</p> <p>7 Q Outside of those two instances, was there any</p> <p>8 other medical training you received?</p> <p>9 A We had to have annual CPR recertification.</p> <p>10 Q And where did you go for that recertification?</p> <p>11 A It was usually -- well, it was held at the jail</p> <p>12 or at the academy.</p> <p>13 Q So that was put on by the sheriff's office?</p> <p>14 A Correct.</p> <p>15 Q You said there was no special training to work in</p> <p>16 the special medical unit, correct?</p> <p>17 A Correct.</p> <p>18 MS. DAVIS: Can I have this marked as</p> <p>19 Exhibit 2, please.</p> <p>20 (Exhibit 2 was marked for</p> <p>21 identification.)</p> <p>22 BY MS. DAVIS:</p> <p>23 Q I'm handing you what's been marked as Exhibit 2</p> <p>24 I'll give you a second to look that over.</p> <p>25 A (Witness reviewing document.)</p>
<p style="text-align: right;">Page 23</p> <p>1 A Yes.</p> <p>2 MR. ARNOLD: You really need to try and</p> <p>3 not talk over each other.</p> <p>4 THE WITNESS: Okay.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q So when you say "this type of report," you're</p> <p>7 talking about the incident report that was</p> <p>8 written for Rebecca Terry?</p> <p>9 A Correct.</p> <p>10 Q Was there a specific type of training for logs,</p> <p>11 records or reports related to security programs?</p> <p>12 MS. KUGLER: Objection; form.</p> <p>13 THE WITNESS: Explain security.</p> <p>14 BY MS. DAVIS:</p> <p>15 Q If we look at the first page again, there's a</p> <p>16 section on security. Was there any separate</p> <p>17 training on logs, records or reports related to</p> <p>18 security?</p> <p>19 A Not that I recall.</p> <p>20 Q And how often -- nevermind. Scratch that.</p> <p>21 You said that the only medical</p> <p>22 training that you had was in the academy,</p> <p>23 correct?</p> <p>24 MS. KUGLER: Objection; form, misstates</p> <p>25 prior testimony.</p>	<p style="text-align: right;">Page 25</p> <p>1 Q Have you seen this document before?</p> <p>2 A A version of it.</p> <p>3 Q Okay. When would you have seen a version of this</p> <p>4 document?</p> <p>5 A Probably in training.</p> <p>6 Q So that would have been in 2010?</p> <p>7 A Mm-hmm. Yes.</p> <p>8 Q And to the best of your recollection, were you</p> <p>9 trained on how to maintain the work station at</p> <p>10 the SMU?</p> <p>11 A Well, the work station -- it was the same no</p> <p>12 matter what area you were working in.</p> <p>13 Q So there was no difference between the training</p> <p>14 for the work station at the SMU or any other post</p> <p>15 in the jail?</p> <p>16 A Correct.</p> <p>17 Q Were you ever trained on maintaining the jail</p> <p>18 logs specifically for the SMU?</p> <p>19 A Not that I recall.</p> <p>20 Q Were you ever trained on the use of telephones in</p> <p>21 the SMU?</p> <p>22 A It was the same as any housing unit.</p> <p>23 Q Was the use of radios the same in other housing</p> <p>24 units as well?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q And the use of televisions?</p> <p>2 A Yes.</p> <p>3 Q And monitoring the alarms and security systems?</p> <p>4 A Yes.</p> <p>5 Q Would the training on emergency situations in the</p> <p>6 SMU have been the same as in other housing units?</p> <p>7 A Yes.</p> <p>8 Q Is there a difference in pod access and cell</p> <p>9 access between housing units?</p> <p>10 A No.</p> <p>11 Q Is there a difference in terms of maintenance and</p> <p>12 sanitation for the SMU as opposed to other</p> <p>13 housing units?</p> <p>14 A Yes.</p> <p>15 Q What's the difference?</p> <p>16 A If I recall correctly, more scheduled biohazard</p> <p>17 and pickups just because of the nature of the</p> <p>18 area.</p> <p>19 Q Is that something you did as a CO or were there</p> <p>20 other people who would handle that?</p> <p>21 A There were inmate workers who were trained in</p> <p>22 biohazard cleaning.</p> <p>23 Q And they were supervised by other COs?</p> <p>24 A Correct.</p> <p>25 Q Do you recall at all how often that would happen,</p>	<p style="text-align: right;">Page 28</p> <p>1 was medical and that involves HIPAA.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q To the best of your understanding, why would an</p> <p>4 inmate be in the SMU?</p> <p>5 MR. ARNOLD: Objection; foundation.</p> <p>6 MS. KUGLER: Join.</p> <p>7 THE WITNESS: That was not my call of</p> <p>8 why they were there or not there.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q So when you were working in the SMU, did you have</p> <p>11 any idea why an inmate would be in the SMU as</p> <p>12 opposed to another housing unit?</p> <p>13 A No, because the confidentiality of medical</p> <p>14 issues.</p> <p>15 Q So were people who were healthy placed in the</p> <p>16 SMU?</p> <p>17 MR. ARNOLD: Objection; foundation.</p> <p>18 THE WITNESS: That -- I don't have the</p> <p>19 training to determine if they were healthy or</p> <p>20 not.</p> <p>21 BY MS. DAVIS:</p> <p>22 Q So even though it's called a special medical</p> <p>23 unit, you're not sure why someone would be housed</p> <p>24 in the SMU as opposed to another housing unit?</p> <p>25 MR. ARNOLD: Objection; asked and</p>
<p style="text-align: right;">Page 27</p> <p>1 when the inmate worker would come in and clean?</p> <p>2 A I recall multiple times a day and based on need.</p> <p>3 Q Is there any difference in the admission to the</p> <p>4 pods in the SMU as opposed to the cells in other</p> <p>5 housing units?</p> <p>6 A Admission in what sense?</p> <p>7 Q In terms of entering the pod versus going into a</p> <p>8 cell.</p> <p>9 A No.</p> <p>10 Q Was there any difference in food service at the</p> <p>11 SMU as opposed to other housing units?</p> <p>12 A Yes, because many of them were on special diets.</p> <p>13 That was about the only difference.</p> <p>14 Q Is there any difference in the way that inmates</p> <p>15 corresponded with the CO in the SMU than the</p> <p>16 other housing units?</p> <p>17 A No.</p> <p>18 MR. ARNOLD: Objection; form.</p> <p>19 BY MS. DAVIS:</p> <p>20 Q And because -- well --</p> <p>21 Were all the people who were</p> <p>22 housed in the SMU because of medical needs?</p> <p>23 MR. ARNOLD: Objection; foundation.</p> <p>24 MS. KUGLER: Join.</p> <p>25 THE WITNESS: That I don't know. That</p>	<p style="text-align: right;">Page 29</p> <p>1 answered.</p> <p>2 MS. KUGLER: Join.</p> <p>3 THE WITNESS: I mean, that's -- medical</p> <p>4 makes the determination who gets housed in the</p> <p>5 SMU versus general housing.</p> <p>6 BY MS. DAVIS:</p> <p>7 Q If an inmate in general housing had a medical</p> <p>8 issue, where would they go?</p> <p>9 MR. ARNOLD: Objection; foundation. If</p> <p>10 you know.</p> <p>11 THE WITNESS: They would have to</p> <p>12 either -- talk to the officer directly for a</p> <p>13 medical request slip. Occasionally there were</p> <p>14 follow-ups based on when they came into the</p> <p>15 booking room.</p> <p>16 If they had some type of chronic</p> <p>17 issue or whatever, they could -- they would be</p> <p>18 seen as a followup if there were medications</p> <p>19 involved or the hangnail, you know, needed</p> <p>20 further treatment. But that's all medical.</p> <p>21 BY MS. DAVIS:</p> <p>22 Q Okay. Were there inmates in general housing</p> <p>23 while you were working there?</p> <p>24 Did you know of any inmates</p> <p>25 transferred from general housing to the SMU</p>

<p style="text-align: right;">Page 30</p> <p>1 because of a medical need, whether you knew what</p> <p>2 the medical need was or not?</p> <p>3 MS. KUGLER: Objection; form.</p> <p>4 THE WITNESS: I don't remember.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q Do you recall about how many pods are in the SMU?</p> <p>7 A How many cells?</p> <p>8 Q Cells. Well, I've seen it listed as pods. Are</p> <p>9 they considered the same as a cell?</p> <p>10 A They refer to pods as housing units, so you could</p> <p>11 say the SMU is a pod; but there are 11 cells in</p> <p>12 the SMU, 11 individual cells for 11 individual</p> <p>13 people.</p> <p>14 Q How many cells were in the other housing pods?</p> <p>15 A It varied. Some were 64, some were 48. It</p> <p>16 depended on which housing. Some were set up</p> <p>17 differently than others.</p> <p>18 Q So on page 46 of this document, at IM 8.1 -- IM</p> <p>19 8.1.8 when it says, "Inmate admission to pod,"</p> <p>20 does that mean the SMU is a pod or a cell?</p> <p>21 MR. ARNOLD: Objection; foundation. If</p> <p>22 you know.</p> <p>23 THE WITNESS: Just to the pod.</p> <p>24 BY MS. DAVIS:</p> <p>25 Q So that would be the SMU?</p>	<p style="text-align: right;">Page 32</p> <p>1 medical situation.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q Okay. So as a CO, were you ever trained to</p> <p>4 provide any kind of medical care to the inmates?</p> <p>5 A No.</p> <p>6 Q Were you trained to alert medical staff of</p> <p>7 medical needs for inmates?</p> <p>8 A Yes.</p> <p>9 Q Was there a particular staff person that you were</p> <p>10 supposed to contact?</p> <p>11 A One of the medical people.</p> <p>12 Q But no medical person specifically, just any</p> <p>13 medical person?</p> <p>14 MS. KUGLER: Objection; form.</p> <p>15 THE WITNESS: Well, I mean, it depends</p> <p>16 on the medical situation. If they're complaining</p> <p>17 of a headache, they fill out a medical request</p> <p>18 form to see one of the providers, and that's up</p> <p>19 to the medical staff when they're going to see</p> <p>20 the person for their headache.</p> <p>21 If it's something where they're</p> <p>22 doubled over in pain, then it would be a medical</p> <p>23 emergency that you would call over the radio and</p> <p>24 say, "I have a medical emergency. Inmate</p> <p>25 complaining of severe stomach pain." That's an</p>
<p style="text-align: right;">Page 31</p> <p>1 A Correct.</p> <p>2 Q Okay. Is there a reason why someone would call</p> <p>3 the cells in the SMU a pod as opposed to a cell?</p> <p>4 MS. KUGLER: Objection; foundation.</p> <p>5 MR. ARNOLD: Join.</p> <p>6 BY MS. DAVIS:</p> <p>7 Q To your knowledge, is there any reason why</p> <p>8 someone would call the cell a pod as opposed</p> <p>9 to --</p> <p>10 A No.</p> <p>11 Q Going back to our discussion of any medical</p> <p>12 training that you ever had for the CO position,</p> <p>13 when an inmate complained of a medical need, what</p> <p>14 were you trained to do in response?</p> <p>15 MS. KUGLER: Objection; form.</p> <p>16 THE WITNESS: It depended on the</p> <p>17 medical issue.</p> <p>18 BY MS. DAVIS:</p> <p>19 Q Okay. So if an inmate came to you requesting</p> <p>20 immediate medical care or some kind of health</p> <p>21 care, what were you trained to do as a CO?</p> <p>22 MR. ARNOLD: Object to the form of the</p> <p>23 question; it's multiple.</p> <p>24 MS. KUGLER: Join.</p> <p>25 THE WITNESS: It depended on the</p>	<p style="text-align: right;">Page 33</p> <p>1 example.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q And would you then escort the person who is</p> <p>4 having the medical emergency over --</p> <p>5 A No. They -- the medical staff and additional</p> <p>6 officers would respond to wherever the inmate</p> <p>7 was, if it was a doubled-over-in-pain situation.</p> <p>8 Q Were you ever a CO who responded with medical</p> <p>9 staff for a medical emergency?</p> <p>10 A Multiple times.</p> <p>11 Q When you responded with medical staff, what was</p> <p>12 your role as the CO?</p> <p>13 A To provide security and also to assist if they</p> <p>14 needed the oxygen bag carried in or if --</p> <p>15 basically, just to stand by until told if they</p> <p>16 needed us to help escort the inmate to the clinic</p> <p>17 or whatever. It varied.</p> <p>18 Q Okay. And what's the difference between the</p> <p>19 clinic and the SMU?</p> <p>20 A The clinic is like a medical clinic you and I</p> <p>21 would go to for -- to see a provider. They had</p> <p>22 doctors, they had advanced practice nurses,</p> <p>23 dentists that came once a week or something.</p> <p>24 So those were appointments in the</p> <p>25 clinic.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q Okay. Well, was it just appointments or</p> <p>2 appointments and medical emergencies?</p> <p>3 MS. KUGLER: Objection; form.</p> <p>4 THE WITNESS: It depended. That was</p> <p>5 medical, depending if they want to take them to</p> <p>6 the clinic for further evaluation or if they</p> <p>7 could determine at the scene that the person</p> <p>8 could stay in the housing unit.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q The numbers are kind of blurry, but I think that</p> <p>11 this is page 49 or 47. I can't tell, but the one</p> <p>12 that's marked Terry 0190179.</p> <p>13 A Mm-hmm.</p> <p>14 Q In Section IM 8.1.12, it discusses inmate health</p> <p>15 care. Do you see that?</p> <p>16 A Mm-hmm.</p> <p>17 Q Was there any training that you remember prior to</p> <p>18 being stationed in the SMU based around inmate</p> <p>19 health care?</p> <p>20 MS. KUGLER: Objection; form.</p> <p>21 THE WITNESS: Not that I recall.</p> <p>22 BY MS. DAVIS:</p> <p>23 Q So there was no additional health care training</p> <p>24 for COs working in the SMU?</p> <p>25 MR. ARNOLD: Asked and answered.</p>	<p style="text-align: right;">Page 36</p> <p>1 times over my career.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q Okay. So the few times that you were there, you</p> <p>4 don't recall whether you were given any</p> <p>5 instructions about an inmate's medical needs</p> <p>6 while housed at the SMU?</p> <p>7 A I don't recall anything specific, no.</p> <p>8 Q When you reported for a shift at the SMU, was</p> <p>9 there any conversation that had to happen with a</p> <p>10 lieutenant or the CO who was on duty before?</p> <p>11 A The CO before would debrief and say, you know, if</p> <p>12 there was anything going on or someone was being</p> <p>13 monitored or whatever.</p> <p>14 Q Under IM 8.1.14 where it says "Lock-up," the same</p> <p>15 page as the inmate health care where it says,</p> <p>16 "Conduct a formal count/wristband check," was</p> <p>17 that a check that you had to do regularly during</p> <p>18 your shift?</p> <p>19 A Yes, at the start and at the end of the shift.</p> <p>20 Q Were there any checks that you had to do</p> <p>21 throughout the shift, or was there -- I'm sorry.</p> <p>22 Were there any checks that you had</p> <p>23 to do throughout your shift?</p> <p>24 A Well, 30-minute observation rounds.</p> <p>25 Q And during those 30-minute observation rounds,</p>
<p style="text-align: right;">Page 35</p> <p>1 THE WITNESS: Not that I recall.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q Were there more health care -- strike that.</p> <p>4 As a CO in the SMU, were you</p> <p>5 responsible for monitoring the inmate's health</p> <p>6 care needs?</p> <p>7 A Well, with any housing unit, if someone had</p> <p>8 health care needs, we would monitor it.</p> <p>9 In the SMU, the few times I worked</p> <p>10 in there, the nurses were in there much more</p> <p>11 often than the regular housing unit, and they</p> <p>12 would tell us if so and so -- you know, to keep</p> <p>13 an eye on his dressing because it's changed every</p> <p>14 couple hours.</p> <p>15 But, "If you notice something, let</p> <p>16 us know." That's kind of how it went.</p> <p>17 Q So when you had reported for your shift at the</p> <p>18 SMU, would the nurses talk to you about the</p> <p>19 different needs of the inmates that were in</p> <p>20 there?</p> <p>21 MR. ARNOLD: Objection; form and</p> <p>22 foundation.</p> <p>23 MS. KUGLER: Join.</p> <p>24 THE WITNESS: Not always. I mean, I</p> <p>25 only worked there -- literally in there a few</p>	<p style="text-align: right;">Page 37</p> <p>1 what did you have to do?</p> <p>2 A Check to make sure that they were all right, even</p> <p>3 if it meant turning on the light or shining a</p> <p>4 flashlight in their eyes.</p> <p>5 Q Was there any count or wristband check during</p> <p>6 those 30-minute intervals?</p> <p>7 A No.</p> <p>8 Q And when you say that you checked to see if they</p> <p>9 were all right, what do you mean?</p> <p>10 A Well, you want to make sure they're breathing,</p> <p>11 make sure they're alive. So that would fall</p> <p>12 under the all right.</p> <p>13 Q Does that mean you would go in and check on</p> <p>14 someone if it looked like they weren't breathing?</p> <p>15 MR. ARNOLD: Object to the form.</p> <p>16 MS. KUGLER: Join.</p> <p>17 THE WITNESS: I would not go in by</p> <p>18 myself -- absolutely not -- for security</p> <p>19 purposes, because you don't know if they're</p> <p>20 pretending or not and would attack you.</p> <p>21 BY MS. DAVIS:</p> <p>22 Q How did you determine if someone was all right?</p> <p>23 A If you couldn't get a response on them by</p> <p>24 knocking on the door and calling their name, then</p> <p>25 you call a medical emergency for an unresponsive</p>

<p style="text-align: right;">Page 38</p> <p>1 inmate.</p> <p>2 Q So if they didn't respond because they were, for</p> <p>3 example asleep, would you then check on them</p> <p>4 again or call in the medical person?</p> <p>5 MR. ARNOLD: Objection; form and</p> <p>6 foundation.</p> <p>7 MS. KUGLER: Join.</p> <p>8 THE WITNESS: If they were asleep, I</p> <p>9 would be waking them up if I couldn't tell they</p> <p>10 were alive, so to speak.</p> <p>11 BY MS. DAVIS:</p> <p>12 Q And I'm asking because you said that you worked</p> <p>13 third shift.</p> <p>14 And if these are every 30 minutes,</p> <p>15 I'm just trying to understand if someone was</p> <p>16 asleep, if that was a cause for concern?</p> <p>17 A Right.</p> <p>18 Q During the 30-minute checks, if someone was --</p> <p>19 seemed like they were not all right like you had</p> <p>20 mentioned, you would always call the medical</p> <p>21 staff?</p> <p>22 A If I could not observe a person breathing or if</p> <p>23 they appeared to be labored breathing or whatever</p> <p>24 you want to call it, yes, I would have called a</p> <p>25 medical emergency.</p>	<p style="text-align: right;">Page 40</p> <p>1 A Everyone has to go to the academy. Or back when</p> <p>2 I started, they did.</p> <p>3 Q And at the academy, was there any specific</p> <p>4 training on being stationed in the SMU?</p> <p>5 A I don't know.</p> <p>6 Q So there was no additional training provided to</p> <p>7 you while you were working in the SMU with people</p> <p>8 who might have medical emergencies?</p> <p>9 MR. ARNOLD: Object to the form of the</p> <p>10 question.</p> <p>11 MS. KUGLER: Join.</p> <p>12 THE WITNESS: Not to my knowledge.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q During those 30-minute checks, about how long did</p> <p>15 it take you to observe the 11 cells in the SMU?</p> <p>16 MR. ARNOLD: Assuming they're all full?</p> <p>17 MS. DAVIS: Sure, assuming they're all</p> <p>18 full.</p> <p>19 THE WITNESS: Five to seven minutes,</p> <p>20 because it's a small place. It's probably a</p> <p>21 little bigger than this conference room.</p> <p>22 BY MS. DAVIS:</p> <p>23 Q And if all of the cells weren't full, would it</p> <p>24 take you much less time to do your 30-minute</p> <p>25 interval checks?</p>
<p style="text-align: right;">Page 39</p> <p>1 Q And how did you base your determination if</p> <p>2 someone was all right? Like what did you base</p> <p>3 that on if you had no training?</p> <p>4 MS. KUGLER: Objection; form.</p> <p>5 MR. ARNOLD: Join.</p> <p>6 THE WITNESS: It was based on</p> <p>7 observation.</p> <p>8 BY MS. DAVIS:</p> <p>9 Q Were you trained on what to look for in order to</p> <p>10 determine if there was a medical emergency at the</p> <p>11 SMU?</p> <p>12 A Not specifically, but I mean, as a reasonable</p> <p>13 human being, I can tell if someone is sleeping</p> <p>14 versus not breathing correctly or whatever.</p> <p>15 Q So you'd base your determination if someone was</p> <p>16 all right on just being reasonable?</p> <p>17 MS. KUGLER: Objection; form, misstates</p> <p>18 prior testimony.</p> <p>19 MR. ARNOLD: Join.</p> <p>20 THE WITNESS: That's me personally.</p> <p>21 BY MS. DAVIS:</p> <p>22 Q Do you know of any other COs who went through</p> <p>23 training to work in the SMU?</p> <p>24 A Training in -- from the academy?</p> <p>25 Q Yeah.</p>	<p style="text-align: right;">Page 41</p> <p>1 A It depends. I mean, it depended on the date --</p> <p>2 the number of people, the type of people that</p> <p>3 were in there. There's no set time of how long</p> <p>4 it takes.</p> <p>5 Q That's fair. And the few times that you were</p> <p>6 stationed in the SMU, do your checks take longer</p> <p>7 than seven minutes?</p> <p>8 A I can't recall.</p> <p>9 MS. KUGLER: Objection; form.</p> <p>10 THE WITNESS: I don't recall.</p> <p>11 BY MS. DAVIS:</p> <p>12 Q To the best of your recollection, did any of your</p> <p>13 checks take less than five minutes?</p> <p>14 MR. ARNOLD: If you remember.</p> <p>15 THE WITNESS: I can't remember.</p> <p>16 BY MS. DAVIS:</p> <p>17 Q To the best of your recollection, did any of your</p> <p>18 checks take less than three minutes?</p> <p>19 A I can't recall.</p> <p>20 Q What happened if you didn't conduct the checks</p> <p>21 every 30 minutes?</p> <p>22 A I don't understand your question.</p> <p>23 Q Okay. When you did the 30-minute interval</p> <p>24 checks, did you log those checks?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q And when your lieutenant reviewed that log, was</p> <p>2 there ever -- scratch that.</p> <p>3 If a lieutenant reviewed a log</p> <p>4 where the 30-minute checks weren't all done</p> <p>5 properly, what, if anything, would happen?</p> <p>6 MS. KUGLER: Objection; form.</p> <p>7 THE WITNESS: Speculating, the</p> <p>8 lieutenant should have said something to whoever</p> <p>9 the officer was.</p> <p>10 BY MS. DAVIS:</p> <p>11 Q So if you -- scratch that.</p> <p>12 When you were a lieutenant, did</p> <p>13 you check logs?</p> <p>14 A Yes.</p> <p>15 Q If you noticed that a CO did not complete all the</p> <p>16 checks that they were supposed to do, what did</p> <p>17 you do?</p> <p>18 A I spoke with them and I would also usually make a</p> <p>19 notation in there that I reviewed the log and</p> <p>20 that such and such was missing, and then I would</p> <p>21 tell the officer to make sure that they properly</p> <p>22 do their jail log.</p> <p>23 Q When you reviewed the jail log, did you ever look</p> <p>24 at how long these checks took?</p> <p>25 MR. ARNOLD: This is in any housing</p>	<p style="text-align: right;">Page 44</p> <p>1 BY MS. DAVIS:</p> <p>2 Q I'm sorry. So when you would log those checks in</p> <p>3 in the 30-minute intervals, did you start a timer</p> <p>4 or something to know when you began the check?</p> <p>5 A No.</p> <p>6 Q Okay.</p> <p>7 A I -- sometimes I would type in, "Started</p> <p>8 inspection, completed inspection, nothing</p> <p>9 observed."</p> <p>10 In that small of a unit, I highly</p> <p>11 doubt that people would do that because it would</p> <p>12 take longer to do that than to actually do your</p> <p>13 inspection. But not in -- not in a small unit</p> <p>14 like that. It was usually just completed.</p> <p>15 Q Okay. So in the larger housing units, where you</p> <p>16 said that there were 48 or 64 cells, right?</p> <p>17 A Right.</p> <p>18 Q When you did your checks -- when you did the</p> <p>19 rounds every 30 minutes, how did you log that?</p> <p>20 A Personally?</p> <p>21 Q Mm-hmm.</p> <p>22 A Would have logged start, then done the</p> <p>23 inspection, and then completed the inspection.</p> <p>24 Q Okay. And in the few times -- if you remember,</p> <p>25 the few times you were in the SMU, did you log</p>
<p style="text-align: right;">Page 43</p> <p>1 unit?</p> <p>2 MS. DAVIS: Any housing unit.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MS. DAVIS:</p> <p>5 Q Why?</p> <p>6 A Why?</p> <p>7 Q Yes.</p> <p>8 A Because they're required to perform</p> <p>9 regularly-scheduled inspections of all the</p> <p>10 inmates in the cells.</p> <p>11 Q And if you noticed that a check happened in less</p> <p>12 than a minute in the SMU, would that be something</p> <p>13 that would stand out to you?</p> <p>14 MS. KUGLER: Object to form.</p> <p>15 MR. ARNOLD: And foundation.</p> <p>16 THE WITNESS: In theory, yes.</p> <p>17 BY MS. DAVIS:</p> <p>18 Q Okay. When you were a CO, in the few times you</p> <p>19 worked in the SMU, did you ever complete your</p> <p>20 check in less than a minute?</p> <p>21 MR. ARNOLD: Objection; foundation.</p> <p>22 THE WITNESS: I don't recall, but</p> <p>23 highly unlikely because it takes me 30 seconds to</p> <p>24 get out of the chair and walk to the door.</p> <p>25</p>	<p style="text-align: right;">Page 45</p> <p>1 start, do the inspection, and then --</p> <p>2 A I don't recall.</p> <p>3 Q Were you trained to log inspections that way?</p> <p>4 MS. KUGLER: Objection.</p> <p>5 MR. ARNOLD: Objection; form and</p> <p>6 foundation.</p> <p>7 MS. KUGLER: Join.</p> <p>8 THE WITNESS: I don't remember.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q I'll rephrase it. Would keeping the jail logs --</p> <p>11 you said you had training on keeping jail logs,</p> <p>12 correct?</p> <p>13 A Yes.</p> <p>14 Q Okay. And during that training, were you</p> <p>15 instructed on how to either start or stop the</p> <p>16 timer or clock, or whatever it is that you all</p> <p>17 click to do the inspections?</p> <p>18 MR. ARNOLD: Objection; form,</p> <p>19 foundation. If you understand, go ahead.</p> <p>20 MS. KUGLER: Join.</p> <p>21 THE WITNESS: We were given -- I mean,</p> <p>22 when you -- when you first came out of the</p> <p>23 academy, you started and you partnered with</p> <p>24 officers that were already working there in the</p> <p>25 trade.</p>

<p style="text-align: right;">Page 46</p> <p>1 They were the ones that -- you</p> <p>2 know, "Here's the jail log" and helped us get</p> <p>3 going.</p> <p>4 BY MS. DAVIS:</p> <p>5 Q Okay.</p> <p>6 A Because --</p> <p>7 Q Sorry.</p> <p>8 MR. ARNOLD: Finish your answer.</p> <p>9 THE WITNESS: I mean, it was just to</p> <p>10 help us make sure we had everything included.</p> <p>11 Because when you start as an</p> <p>12 officer, you're a little overwhelmed by all the</p> <p>13 things you needed to do. So...</p> <p>14 BY MS. DAVIS:</p> <p>15 Q Okay. So after the academy, when you first</p> <p>16 start, there's a little bit of informal training</p> <p>17 that happens between COs?</p> <p>18 A Yes.</p> <p>19 MR. ARNOLD: Try to let her finish her</p> <p>20 question.</p> <p>21 THE WITNESS: Okay.</p> <p>22 BY MS. DAVIS:</p> <p>23 Q I finished. I didn't know --</p> <p>24 A Yes.</p> <p>25 Q So you were taught by another CO how to log these</p>	<p style="text-align: right;">Page 48</p> <p>1 A Yeah.</p> <p>2 Q And is that your name in the log text?</p> <p>3 A Yes.</p> <p>4 Q Was this entry in response to the occurrence two</p> <p>5 rows up?</p> <p>6 MS. KUGLER: Objection; form.</p> <p>7 MR. ARNOLD: If you know.</p> <p>8 THE WITNESS: I would assume so.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q Had you ever been called to respond to an inmate</p> <p>11 suicide attempt while you worked at the jail?</p> <p>12 A Yes.</p> <p>13 Q Can you -- do you recall how many times that</p> <p>14 happened?</p> <p>15 A I don't remember.</p> <p>16 Q Was it something that happened more than five</p> <p>17 times?</p> <p>18 A I don't remember.</p> <p>19 Q If an inmate attempted suicide, would there be an</p> <p>20 incident report written?</p> <p>21 MR. ARNOLD: Objection; foundation.</p> <p>22 MS. KUGLER: Join.</p> <p>23 BY MS. DAVIS:</p> <p>24 Q Do you know if an incident report would be</p> <p>25 generated for an inmate suicide attempt?</p>
<p style="text-align: right;">Page 47</p> <p>1 checks?</p> <p>2 A Correct.</p> <p>3 Q Was there any difference in logging the 30-minute</p> <p>4 checks between the SMU and other housing units?</p> <p>5 MR. ARNOLD: Other than what she's</p> <p>6 already testified to?</p> <p>7 THE WITNESS: No.</p> <p>8 (Exhibit 3 was marked for</p> <p>9 identification.)</p> <p>10 BY MS. DAVIS:</p> <p>11 Q I'm going to hand you what's been marked as</p> <p>12 Exhibit 3. Do you recognize what kind of</p> <p>13 document this is?</p> <p>14 A It's a jail log.</p> <p>15 Q And is this typical of the jail logs -- well,</p> <p>16 strike that.</p> <p>17 Does this look like how the jail</p> <p>18 logs you created looked?</p> <p>19 A Yes.</p> <p>20 Q So I'm going to direct you to page 992 at the</p> <p>21 bottom. It should say "MKE County 992."</p> <p>22 A Mm-hmm.</p> <p>23 Q There is an entry close to the bottom of the page</p> <p>24 with a user date/time of 3/10/14 -- or I'm</p> <p>25 sorry -- 3/9/14, 11:47 p.m. Do you see that?</p>	<p style="text-align: right;">Page 49</p> <p>1 A It should be.</p> <p>2 Q Do you know if there was one written for this</p> <p>3 attempted suicide on --</p> <p>4 A I don't recall.</p> <p>5 Q Okay. Do you remember being called down to the</p> <p>6 SMU for -- I'm sorry. Let me take a step back.</p> <p>7 What housing unit did this happen</p> <p>8 in? Can you tell from this document?</p> <p>9 A Housing Unit 4B.</p> <p>10 Q 4B. Is that the SMU or another housing unit?</p> <p>11 A That's another housing unit.</p> <p>12 Q Okay. So this is one of the housing units that</p> <p>13 has about 48 or 64 cells?</p> <p>14 A Yes.</p> <p>15 Q And when you're asked to report to another</p> <p>16 housing unit because of an attempted suicide,</p> <p>17 what is your role?</p> <p>18 A Well, the main -- I mean, when you first respond,</p> <p>19 is to make sure that all the other inmates are</p> <p>20 secured in their cells, which means checking the</p> <p>21 doors. At that time of night, they should have</p> <p>22 been in their cells, but you still check the</p> <p>23 doors.</p> <p>24 And then just provide -- stand by</p> <p>25 until if a nurse asks you to go get something</p>

Page 50	Page 52
<p>1 or -- it's usually just stand by unless they need</p> <p>2 help lifting a person or whatever.</p> <p>3 Q Now let's look at MKE County 996.</p> <p>4 A Okay.</p> <p>5 Q About three rows down there's an entry 3/9/14,</p> <p>6 10:51 p.m.?</p> <p>7 A Mm-hmm.</p> <p>8 Q Is that your name in the log text?</p> <p>9 A Yes, it is.</p> <p>10 Q It says you're in pod to assist with inspection</p> <p>11 while CO Duerr sets up the RIPP bed in SNA 3.</p> <p>12 A Yes.</p> <p>13 Q What pod is SPND?</p> <p>14 A That is the special needs unit.</p> <p>15 Q What is the special needs unit?</p> <p>16 A That is for inmates who have severe mental health</p> <p>17 issues and are either off of their meds, not</p> <p>18 med-compliant, or aren't medicated and need to be</p> <p>19 medicated.</p> <p>20 Most of them are severely mentally</p> <p>21 ill in that unit.</p> <p>22 Q Are there -- sorry. To the best of your</p> <p>23 knowledge, is there any medical staff stationed</p> <p>24 in the special needs unit?</p> <p>25 MS. KUGLER: Objection; form.</p>	<p>1 A It's a restraint -- I'm not sure what it stands</p> <p>2 for anymore. It's a restraint bed.</p> <p>3 Q Okay.</p> <p>4 A Setting it up means setting up the different</p> <p>5 security straps.</p> <p>6 Q Were you ever stationed in the special needs</p> <p>7 unit?</p> <p>8 A Yes.</p> <p>9 MR. ARNOLD: Objection; asked and</p> <p>10 answered. Go ahead.</p> <p>11 THE WITNESS: Yes, I was.</p> <p>12 BY MS. DAVIS:</p> <p>13 Q Thank you.</p> <p>14 MR. ARNOLD: You're asking special</p> <p>15 needs now, not --</p> <p>16 MS. DAVIS: Yeah.</p> <p>17 MR. ARNOLD: Okay. -- not the SMU?</p> <p>18 MS. DAVIS: It's not the SMU. It's the</p> <p>19 special medical unit.</p> <p>20 MR. ARNOLD: Gotcha.</p> <p>21 BY MS. DAVIS:</p> <p>22 Q I'm sorry. Whenever you set up one of these</p> <p>23 restraint beds, did you have to call in another</p> <p>24 CO to help with inspections?</p> <p>25 A Yes.</p>
Page 51	Page 53
<p>1 MR. ARNOLD: Any time or all times?</p> <p>2 MS. DAVIS: At all times.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MS. DAVIS:</p> <p>5 Q Okay. Are there -- is there nursing staff or</p> <p>6 medical staff stationed either in or near the SMU</p> <p>7 at all times?</p> <p>8 MS. KUGLER: Objection; form.</p> <p>9 MR. ARNOLD: If you know.</p> <p>10 THE WITNESS: Well, the nurses' offices</p> <p>11 and area are directly across from the SMU.</p> <p>12 Now, depending on staffing, if</p> <p>13 they're doing med rounds or what have you,</p> <p>14 physically there might not be anybody in there.</p> <p>15 BY MS. DAVIS:</p> <p>16 Q So, if you know, about how long would you</p> <p>17 estimate that it would take to get from the</p> <p>18 clinic or the nursing and medical staff part to</p> <p>19 the SMU?</p> <p>20 A A minute, 30 seconds.</p> <p>21 Q And then, if you know, about how long would it</p> <p>22 take to get from the clinic or the medical</p> <p>23 nursing staff part to the special needs unit?</p> <p>24 A 45 seconds to a minute. It's down the hallway.</p> <p>25 Q Okay. What does set up the RIPP bed mean?</p>	<p>1 Q Why was that?</p> <p>2 A Well, on third shift there's -- when I was in</p> <p>3 there, it was one officer assigned to that unit</p> <p>4 on third shift.</p> <p>5 You can't be setting up a bed and</p> <p>6 be able to keep an eye on the inmates.</p> <p>7 Q Okay. And how many cells are in the special</p> <p>8 needs unit? I can't remember if I asked you this</p> <p>9 or not.</p> <p>10 A 18.</p> <p>11 Q So it's a smaller unit like the SMU?</p> <p>12 A Yes.</p> <p>13 Q Was there any training that you had to go through</p> <p>14 to work in the special needs unit?</p> <p>15 A Yes.</p> <p>16 Q Was that a one-time training or multiple</p> <p>17 trainings?</p> <p>18 A Well, when I first started, I was trained --</p> <p>19 because there were still deputies assigned to the</p> <p>20 jail, I was trained by a deputy who had worked in</p> <p>21 there multiple years on how to work in there, and</p> <p>22 then I took the additional crisis intervention</p> <p>23 training.</p> <p>24 Q So the crisis intervention training was related</p> <p>25 to working in the special needs unit?</p>

<p style="text-align: right;">Page 54</p> <p>1 A Well, not 100 percent. Crisis intervention is</p> <p>2 for any type of person that is having a crisis,</p> <p>3 be it a temporary mental health crisis or a</p> <p>4 permanent mental health crisis.</p> <p>5 The Milwaukee Police Department</p> <p>6 uses CITs now on a regular basis. They work with</p> <p>7 police officers and respond to mental health</p> <p>8 crises or people in mental distress.</p> <p>9 Q So when -- so when you say "crisis intervention,"</p> <p>10 it's specifically mental health crisis?</p> <p>11 A I mean, it comes under the general heading, but</p> <p>12 it can be someone -- I mean, we responded to</p> <p>13 people that come in, they were arrested, and</p> <p>14 they're upset about being arrested. So they're</p> <p>15 having a temporary breakdown or crying fit or</p> <p>16 whatever.</p> <p>17 And we were trained -- additional</p> <p>18 training on basically verbal communication to</p> <p>19 assist with getting them calmed down.</p> <p>20 Q Okay. What topics were covered in the training</p> <p>21 to work in the special needs unit?</p> <p>22 A For the crisis intervention? See, now for my</p> <p>23 training in special needs, I did -- I learned a</p> <p>24 lot from the deputy who I worked with, but I also</p> <p>25 took it on myself to read materials on different</p>	<p style="text-align: right;">Page 56</p> <p>1 that third row where your name is, the start time</p> <p>2 is listed at 10:51 and the end time is listed at</p> <p>3 10:52.</p> <p>4 Are those times for how long it</p> <p>5 took to set up the bed?</p> <p>6 A No. That's -- the 10:51 and the 10:52, I'm --</p> <p>7 it's when it started. Sometimes if you start</p> <p>8 entering it at 10:51 and when you hit enter it's</p> <p>9 10:52 -- it doesn't say how long I was there.</p> <p>10 He never said I left, I guess, is</p> <p>11 what this looks like.</p> <p>12 Q So are those two times supposed to indicate when</p> <p>13 you arrived and when you left?</p> <p>14 A No. He should have made -- he should have had a</p> <p>15 second entry that said I left. This just shows I</p> <p>16 arrived.</p> <p>17 Q And when it says that you assisted with</p> <p>18 inspections, does that mean you completed one of</p> <p>19 those rounds or that you were just there to</p> <p>20 observe while he set the bed up?</p> <p>21 A I don't recall. I mean, I don't even recall</p> <p>22 being in there on that specific day.</p> <p>23 Q Let's talk about the incident report a little bit</p> <p>24 for the one you reviewed.</p> <p>25 MS. KUGLER: Can I interrupt you for a</p>
<p style="text-align: right;">Page 55</p> <p>1 mental health disorders and medications, etc.,</p> <p>2 because I wanted to be a knowledgeable officer.</p> <p>3 Q And when you say that the deputy helped train</p> <p>4 you, was that the informal on-the-job training</p> <p>5 that you discussed a little bit earlier?</p> <p>6 A Yes.</p> <p>7 Q Was there any way to track that kind of training?</p> <p>8 MS. KUGLER: Objection; form,</p> <p>9 foundation.</p> <p>10 MS. DAVIS: I'll rephrase it because</p> <p>11 that was a poorly phrased question.</p> <p>12 BY MS. DAVIS:</p> <p>13 Q When the deputy was assisting you with this</p> <p>14 on-site training, was there any policy that they</p> <p>15 went over and talked to you about?</p> <p>16 A We went through and reviewed the policies and</p> <p>17 procedures that are in everybody -- that</p> <p>18 everybody has access to about that specific unit.</p> <p>19 Q Okay. And was that a more in-depth training than</p> <p>20 you received in the academy?</p> <p>21 A Well, it's more one on one, plus you're with --</p> <p>22 you've got inmates there that actually have</p> <p>23 mental health issues versus listening to a</p> <p>24 lecture.</p> <p>25 Q All right. Actually, going back to page 986 on</p>	<p style="text-align: right;">Page 57</p> <p>1 short break?</p> <p>2 MS. DAVIS: Yes. Absolutely.</p> <p>3 (A recess was taken.)</p> <p>4 (Exhibit 4 was marked for</p> <p>5 identification.)</p> <p>6 BY MS. DAVIS:</p> <p>7 Q Before we look at the incident report, I want to</p> <p>8 just go back and talk about the policies we</p> <p>9 looked at first, Exhibits 1 and 2.</p> <p>10 At the top of both of those</p> <p>11 exhibits, on their first pages, there are</p> <p>12 revisions listed. Whenever a policy was updated,</p> <p>13 were you given a copy of it?</p> <p>14 MR. ARNOLD: Objection; foundation. If</p> <p>15 you know.</p> <p>16 THE WITNESS: They made -- they being</p> <p>17 command staff -- made a point of usually handing</p> <p>18 them out at a roll call for everyone to look at</p> <p>19 or discuss.</p> <p>20 BY MS. DAVIS:</p> <p>21 Q So when policies were updated, were you</p> <p>22 notified -- were you notified every time?</p> <p>23 A I can't recall.</p> <p>24 Q And then in the instances that you can recall,</p> <p>25 were you always handed a copy of a policy?</p>

<p style="text-align: right;">Page 58</p> <p>1 MR. ARNOLD: Same objection; 2 foundation. If you know. 3 THE WITNESS: I don't recall if we got 4 a copy every time or not. 5 BY MS. DAVIS: 6 Q Thinking back on the eight years that you worked 7 at the jail, do you recall any instances where a 8 policy was updated and that you received a 9 subsequent training based on that update? 10 MS. KUGLER: Objection; form. 11 THE WITNESS: I don't recall anything 12 specific. 13 BY MS. DAVIS: 14 Q So is it fair to say that you never got a 15 training based on an updated policy while you 16 worked at the Milwaukee County Jail? 17 MR. ARNOLD: Objection; foundation. 18 She said she didn't remember. 19 THE WITNESS: I don't remember. 20 MS. DAVIS: Could you read back the 21 question, please. 22 (Last question read.) 23 BY MS. DAVIS: 24 Q To the best of your recollection, do you remember 25 any training that you got based on an updated</p>	<p style="text-align: right;">Page 60</p> <p>1 jail, how were you notified that that happened? 2 MS. KUGLER: Objection; form, 3 foundation. 4 THE WITNESS: Well, it was a little bit 5 of news prior to them coming in, so I guess 6 that's how we were informed. 7 BY MS. DAVIS: 8 Q While you were working at the Milwaukee County 9 Jail, do you recall any roll call notification 10 about Armor Correctional -- 11 A I don't recall, no. 12 Q Okay. I hand you what we marked as Exhibit 4. I 13 believe it's the same as the document you said 14 that you reviewed. 15 A Yep. Mm-hmm. 16 Q What is this document? 17 A This would be an incident report. 18 Q Would this be considered a major incident report? 19 A No. 20 Q What is a major incident report? 21 A A major incident report, which rarely happens, 22 would be something where there was an assault on 23 officers or 20 inmates fighting. 24 It has to be major -- it has to be 25 something major. This is a medical emergency.</p>
<p style="text-align: right;">Page 59</p> <p>1 policy while you worked at the Milwaukee County 2 Jail? 3 A Not a specific policy, but I'm sure we had it, 4 because that's what roll call is used for. 5 Q Roll calls were used for training? 6 A Well, that was part of roll call besides, you 7 know, the shift assignments. 8 And then if there's a new policy, 9 they would have talked about it or they would 10 have talked about whatever. 11 Q So when you say "training," do you just mean that 12 they talked about it or -- 13 A Informal training versus classroom training. 14 MS. KUGLER: Objection; form. 15 BY MS. DAVIS: 16 Q Was there ever any followup after the informal 17 training? 18 A Nothing formal. 19 Q Did you ever have to sign any documents that said 20 that you understood that there was an update to a 21 policy? 22 A On occasion we did have to sign that we received 23 it or read it or whatever, but I can't tell you 24 which ones we signed or didn't sign. 25 Q Okay. And then when Armor started working in the</p>	<p style="text-align: right;">Page 61</p> <p>1 This is just a regular incident report. 2 Q And are major incident reports written up by COs 3 as well? 4 A Major incident reports -- I can't even remember. 5 It usually involves -- the lieutenant writes 6 that, but there are supplemental reports by all 7 the involved officers. 8 The major incident report 9 basically gives a synopsis of what happened, and 10 then all the other documents go with it. But I 11 don't even remember anymore what's all involved 12 with that. 13 Q So for an incident report like this one where 14 it's about a medical emergency, would there just 15 be one report written -- 16 A For this type of situation? Yes. 17 Q Okay. So even though there are numerous COs 18 listed as being on the scene, it would just be 19 this one incident report generated? 20 A Yes. 21 Q At the bottom of the page marked "MKE County 11," 22 there are two boxes. One says, "Time Received" 23 and "Time Cleared." What does that mean? 24 MR. ARNOLD: Objection; foundation. If 25 you know.</p>

<p style="text-align: right;">Page 62</p> <p>1 THE WITNESS: I don't know.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q When you were a lieutenant, did you have to</p> <p>4 review any incident reports?</p> <p>5 A Yes.</p> <p>6 Q Did you have to fill out this bottom section, or</p> <p>7 was that filled out by the CO?</p> <p>8 A I believe the time received, time cleared is a</p> <p>9 computer function.</p> <p>10 Q So when would the computer generate these</p> <p>11 timestamps?</p> <p>12 MR. ARNOLD: Objection; foundation. If</p> <p>13 you know.</p> <p>14 THE WITNESS: I don't know.</p> <p>15 BY MS. DAVIS:</p> <p>16 Q When you submit an incident report, do you have</p> <p>17 to log the time?</p> <p>18 MS. KUGLER: Objection; form.</p> <p>19 THE WITNESS: The computer -- you can</p> <p>20 submit logs at the time.</p> <p>21 BY MS. DAVIS:</p> <p>22 Q Do you know where on the form that would show up?</p> <p>23 A I don't know.</p> <p>24 Q Did you receive any training on how to generate</p> <p>25 one of these incident reports?</p>	<p style="text-align: right;">Page 64</p> <p>1 A No.</p> <p>2 Q Other than taking draft off of the form --</p> <p>3 A It's a computer function.</p> <p>4 Q So other than taking draft off of it, is there</p> <p>5 anything else that you could point to to show</p> <p>6 that it was approved?</p> <p>7 A No. You can't take draft off of it until you hit</p> <p>8 the approved in the computer. You can't force it</p> <p>9 to disappear.</p> <p>10 Q So at the bottom on MKE County 11, the time</p> <p>11 received and time cleared, you're saying those</p> <p>12 were just generated by the computer?</p> <p>13 A Right.</p> <p>14 Q And where it says, "Reviewed by Montano, CO</p> <p>15 Crystalina," did Lieutenant Montano have to enter</p> <p>16 her name herself, or is that something that CO</p> <p>17 Wenzel would have entered, if you know?</p> <p>18 MR. ARNOLD: Objection; foundation.</p> <p>19 MS. KUGLER: Join.</p> <p>20 THE WITNESS: He would have submitted</p> <p>21 his report to her in the computer. She has to</p> <p>22 log in to the report program under her name.</p> <p>23 And normally, unless it's</p> <p>24 something -- she's the only one who can look --</p> <p>25 you know, who has direct access to it, but she</p>
<p style="text-align: right;">Page 63</p> <p>1 A Yes.</p> <p>2 Q Did they instruct you on how to enter the time on</p> <p>3 the form?</p> <p>4 MS. KUGLER: Objection; form.</p> <p>5 THE WITNESS: The time should be</p> <p>6 entered in the body of the thing. When you</p> <p>7 enter -- the 5:23 is probably when he entered the</p> <p>8 information into the computer, but I can't say</p> <p>9 that with 100 percent surety.</p> <p>10 In the body of his thing, in his</p> <p>11 report, it should say what time, what happened,</p> <p>12 etc. Sometimes they don't get to write the</p> <p>13 report until everything is over with because</p> <p>14 they're not going to say, "Wait, I have to enter</p> <p>15 this to write the report."</p> <p>16 BY MS. DAVIS:</p> <p>17 Q And as a lieutenant, when you reviewed these</p> <p>18 incident reports, did you have to approve them?</p> <p>19 A Yes.</p> <p>20 Q How was that marked on the incident report?</p> <p>21 A Well, this must be approved because there's no --</p> <p>22 until it's approved, it will say draft across the</p> <p>23 copies.</p> <p>24 Q And is there some kind of signature that needs to</p> <p>25 be added to show that it was approved?</p>	<p style="text-align: right;">Page 65</p> <p>1 wouldn't have typed that in. It would have been</p> <p>2 generated by the report program.</p> <p>3 BY MS. DAVIS:</p> <p>4 Q So what parts of MKE County 11 would have been</p> <p>5 written by a person as opposed to generated by a</p> <p>6 computer, if you know?</p> <p>7 MR. ARNOLD: Objection; foundation.</p> <p>8 MS. KUGLER: Join.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q Let me rephrase it. Actually, let me take a step</p> <p>11 back.</p> <p>12 When you were trained on filling</p> <p>13 out these reports, were you told what sections</p> <p>14 you had to write in?</p> <p>15 A Yes. And the computer requires you to enter that</p> <p>16 information or it won't proceed.</p> <p>17 Q What sections on MKE County 11 do you have to</p> <p>18 fill in before the computer will proceed?</p> <p>19 A Everything. I mean, he entered -- you know, he's</p> <p>20 reporting the incident, he's reporting the time,</p> <p>21 the computer generates the report number, he's</p> <p>22 putting in where it happened, he used the proper</p> <p>23 code for a medical emergency.</p> <p>24 And then when you do reporting</p> <p>25 officer, if you look on the back page, he's the</p>

<p style="text-align: right;">Page 66</p> <p>1 reporting officer, and the supervisor is</p> <p>2 Lieutenant Montano.</p> <p>3 Q So what parts of MKE County 11 were generated by</p> <p>4 a computer?</p> <p>5 A He has to type this information in. He typed the</p> <p>6 summary in.</p> <p>7 Q So the time received and time cleared, is that</p> <p>8 something that you were trained to enter yourself</p> <p>9 or that the computer would generate?</p> <p>10 A The computer is going to ask you what time it</p> <p>11 occurred or what time he's doing the report, and</p> <p>12 5:23 must have been when he was doing the report.</p> <p>13 I was not there for when he did</p> <p>14 his report.</p> <p>15 Q Well, going to MKE County 12 -- MKE County 12</p> <p>16 through 14, on the bottom it says, "Reporting</p> <p>17 Officer ID No. and pages."</p> <p>18 Are those areas that would be</p> <p>19 generated by the computer? Do you know if those</p> <p>20 are areas that would be generated by the</p> <p>21 computer?</p> <p>22 MS. KUGLER: Objection; form.</p> <p>23 THE WITNESS: That would be -- once he</p> <p>24 enters he's the reporting officer, it's going to</p> <p>25 keep appearing for each page that's generated in</p>	<p style="text-align: right;">Page 68</p> <p>1 A Yes.</p> <p>2 Q Do you remember if there was any blood that you</p> <p>3 saw there?</p> <p>4 A I don't recall that.</p> <p>5 Q Okay. Did she -- well, I'll rephrase.</p> <p>6 Do you remember how Rebecca Terry</p> <p>7 was behaving at that time?</p> <p>8 MS. KUGLER: Objection; form.</p> <p>9 THE WITNESS: I don't recall.</p> <p>10 BY MS. DAVIS:</p> <p>11 Q Do you recall whether she was calm?</p> <p>12 A She wasn't screaming and yelling. That I would</p> <p>13 say.</p> <p>14 Q Do you recall whether the baby was crying?</p> <p>15 A I don't recall. I mean, I was three people back,</p> <p>16 because the nurses -- they were all up front and</p> <p>17 close. We were basically waiting for</p> <p>18 instruction.</p> <p>19 Q Were you given any instructions while you were</p> <p>20 there?</p> <p>21 A I don't recall anything specific.</p> <p>22 Q Do you recall what you did after this incident</p> <p>23 resolved itself -- or was resolved, I should say?</p> <p>24 A I don't recall.</p> <p>25 Q Okay. Was there any followup done about this</p>
<p style="text-align: right;">Page 67</p> <p>1 the report.</p> <p>2 BY MS. DAVIS:</p> <p>3 Q Okay. Looking at the third paragraph down that</p> <p>4 begins at 04:46 hours, is that your name at the</p> <p>5 end of the first line and to the second line?</p> <p>6 A Yes, it is.</p> <p>7 Q Do you recall reporting to the SMU the morning of</p> <p>8 March 10, 2014?</p> <p>9 A It says I was there, so I must have been there.</p> <p>10 Q Do you remember being there?</p> <p>11 A Vaguely. I mean, generally.</p> <p>12 Q And when you reported -- do you remember where</p> <p>13 you came from?</p> <p>14 A I don't remember. I don't know where I was</p> <p>15 assigned that day.</p> <p>16 Q And when you reported, did you come in with the</p> <p>17 medical staff or did you just go there directly?</p> <p>18 A I most likely reported directly from wherever I</p> <p>19 was coming from.</p> <p>20 Q While you were in the SMU that morning, do you</p> <p>21 remember any actions that you did specifically?</p> <p>22 A Nothing specific.</p> <p>23 Q While you were there, did you see Rebecca Terry?</p> <p>24 A Yes.</p> <p>25 Q Do you recall seeing her and her baby?</p>	<p style="text-align: right;">Page 69</p> <p>1 incident?</p> <p>2 MS. KUGLER: Objection; form.</p> <p>3 THE WITNESS: I don't recall</p> <p>4 specifically.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q Did anyone at the jail speak with you about this</p> <p>7 incident after it happened?</p> <p>8 A I don't recall.</p> <p>9 Q Did you talk to anybody about this incident after</p> <p>10 it happened?</p> <p>11 A I don't recall.</p> <p>12 Q Do you recall how long you were in the SMU that</p> <p>13 night?</p> <p>14 A I don't recall, but, I mean, based on the report,</p> <p>15 probably till about five o'clock.</p> <p>16 Q Do you recall any other times that a baby was</p> <p>17 delivered in the Milwaukee County Jail?</p> <p>18 A I don't recall. I was not there for anything,</p> <p>19 but I don't know for sure.</p> <p>20 Q When this -- scratch that.</p> <p>21 Earlier you said that other COs</p> <p>22 don't review report incidents. Let me rephrase</p> <p>23 that. Did you review this report -- incident</p> <p>24 report before it was submitted?</p> <p>25 A No.</p>

Page 70	Page 72
<p>1 Q Did you see it before you started preparing for 2 this deposition? 3 A Yes. 4 Q When? 5 A When I received a copy from this gentleman. 6 Q Okay. But outside of any preparation for the 7 deposition, did you ever look at this report? 8 A No. 9 Q Did CO Wenzel ever talk to you about the 10 incident? 11 A Not that I recall. I mean, he -- not that I 12 recall anything specific. 13 Q Okay. On MKE 2014 -- 14 MS. KUGLER: Sorry. What did you say? 15 MS. DAVIS: MKE County 2014. 16 THE WITNESS: Okay. 17 BY MS. DAVIS: 18 Q -- it lists that there was an -- assisting 19 correctional officer, six. 20 A Yes. 21 Q In your experience, was it common for there to be 22 six assisting correctional officers for a medical 23 emergency? 24 MR. ARNOLD: Objection; foundation. 25 THE WITNESS: When a medical emergency</p>	<p>1 available -- and I've seen where 20, 30 people 2 show up, and if they're not needed, some of them 3 are told, "You can go back to your posts." 4 Q Okay. Do other supervisors respond? 5 A If they're available. Again, on third shift it's 6 a much smaller staff, so hopefully -- I mean, if 7 you're available, you respond; if they're not 8 available, they don't respond. 9 Unless they're specifically 10 called, we need additional supervisors, 11 additional whatever. 12 Q And so would you find out a medical emergency 13 over the radio? 14 A Correct. 15 Q When you found out about it, is there any 16 description of what's happening, or do you just 17 hear that it's a medical emergency? 18 A It depends on the -- most officers try to say 19 something like -- and I don't know what he would 20 have said -- you know, "Medical emergency: 21 Inmate appears to be in labor," or "Medical 22 emergency: Inmate complaining of severe 23 abdominal pain; Medical emergency: Inmate 24 appears to be self-harming." 25 They don't want to say too much</p>
Page 71	Page 73
<p>1 is called over the radio, any available officer 2 responds. If there's only three, three respond; 3 if there's six, six respond. 4 And on third shift, there's going 5 to be a lot less officers than on first or 6 second. 7 BY MS. DAVIS: 8 Q So any correctional officer who is not busy would 9 report for -- or assist with a medical emergency? 10 A Correct? 11 Q Is there any chance that someone wouldn't respond 12 to a medical emergency call? 13 MS. KUGLER: Objection; foundation. 14 MR. ARNOLD: Join. 15 BY MS. DAVIS: 16 Q Can you recall any instance where someone would 17 not respond to an emergency medical call? 18 A Unless they're occupied with something else -- if 19 they're in the booking room, they're not going to 20 respond because they're probably booking an 21 inmate in. 22 Q So just hypothetically, if there were ten 23 officers who were not busy, ten people could show 24 up? 25 A Ten people would respond. If 20 were</p>	<p>1 because of HIPAA. 2 Q Do you remember what was said over the radio that 3 day? 4 A I absolutely don't recall. 5 Q Did you stay in the SMU until Miss Terry was 6 taken out via ambulance? 7 A I don't recall. 8 Q Outside of reviewing this document, do you recall 9 anything about Miss Terry giving birth in the SMU 10 on March 10th, 2014? 11 A No. I wasn't there for the actual birth, so I 12 don't know. 13 Q Do you remember anything about reporting to 14 assist until you looked at this incident report? 15 MS. KUGLER: Objection; form. 16 THE WITNESS: No. 17 BY MS. DAVIS: 18 Q Did you have any independent recollection about 19 the morning of March 10th, 2014, before this 20 deposition was scheduled? 21 A No. 22 Q Going back to when you were talking about Terrill 23 Thomas and -- let me get it right this time -- 24 the inquest about Terrill Thomas, do you know if 25 other correctional officers were asked to testify</p>

<p style="text-align: right;">Page 74</p> <p>1 about that?</p> <p>2 A Yes.</p> <p>3 Q Do you know how many other officers?</p> <p>4 A I don't know the exact number, no.</p> <p>5 Q Do you recall any other inquests being done about</p> <p>6 inmates either having medical emergencies or</p> <p>7 dying while in the jail?</p> <p>8 MS. KUGLER: Objection; form.</p> <p>9 THE WITNESS: I don't recall.</p> <p>10 BY MS. DAVIS:</p> <p>11 Q Do you recall any other deaths happening in the</p> <p>12 jail while you were a CO or a lieutenant?</p> <p>13 A Yes, but I couldn't tell you names or when.</p> <p>14 Q Do you recall other deaths happening in the jail</p> <p>15 while Armor Correctional Health had a contract</p> <p>16 with the Milwaukee County Jail?</p> <p>17 A That I don't recall.</p> <p>18 Q Are there inquests done outside of an inmate</p> <p>19 death?</p> <p>20 MR. ARNOLD: Objection; foundation. If</p> <p>21 you know.</p> <p>22 MS. KUGLER: Join.</p> <p>23 BY MS. DAVIS:</p> <p>24 Q I'll rephrase the question.</p> <p>25 In your experience do you know of</p>	<p style="text-align: right;">Page 76</p> <p>1 STATE OF WISCONSIN)</p> <p>2) SS:</p> <p>3 MILWAUKEE COUNTY)</p> <p>4 I, Sandra K. Nelson, RPR and Notary</p> <p>5 Public in and for the State of Wisconsin, do</p> <p>6 hereby certify that the preceding deposition was</p> <p>7 recorded by me and reduced to writing under my</p> <p>8 personal direction.</p> <p>9 I further certify that said deposition</p> <p>10 was taken at LEIB KNOTT GAYNOR, 219 North</p> <p>11 Milwaukee Street, Milwaukee, Wisconsin, 53202, on</p> <p>12 the 16th day of April, 2018 commencing at</p> <p>13 10:02 a.m.</p> <p>14 I further certify that I am not a</p> <p>15 relative or employee or attorney or counsel of</p> <p>16 any of the parties, or a relative or employee of</p> <p>17 such attorney or counsel, or financially</p> <p>18 interested, directly or indirectly, in this</p> <p>19 action.</p> <p>20 In witness whereof, I have hereunto set</p> <p>21 my hand and affixed my seal of office on this 5th</p> <p>22 day of June, 2018.</p> <p>23</p> <p>24 _____</p> <p>25 SANDRA K. NELSON, RPR</p> <p>Notary Public</p> <p>My commission expires December 28, 2018.</p>
<p style="text-align: right;">Page 75</p> <p>1 any other inquests that were done when an inmate</p> <p>2 death was not involved?</p> <p>3 A I have no -- no, I don't have any knowledge or</p> <p>4 recollection.</p> <p>5 Q Okay. Why were you asked to testify during the</p> <p>6 inquest?</p> <p>7 MS. KUGLER: Objection; foundation.</p> <p>8 MR. ARNOLD: If you know.</p> <p>9 THE WITNESS: Probably because I was a</p> <p>10 lieutenant. I mean, they literally asked me my</p> <p>11 name, my position, and do I work at the Milwaukee</p> <p>12 County Jail.</p> <p>13 And did I have any involvement</p> <p>14 with that? Absolutely not. I wasn't even -- I</p> <p>15 don't think I was working those days that that</p> <p>16 occurred. I was scheduled off.</p> <p>17 MS. DAVIS: Okay. I think that's all</p> <p>18 that I have.</p> <p>19 MS. KUGLER: No questions.</p> <p>20 MR. ARNOLD: You are done. Thank you</p> <p>21 very much.</p> <p>22 (Deposition concluded at 11:44 a.m.)</p> <p>23 (Original exhibits attached to original</p> <p>24 transcript. Copies of exhibits attached to</p> <p>25 copies of transcripts.)</p>	

<hr/> 0 <hr/> 0190179 34:12 04:46 67:4 05 8:9 06 8:8 <hr/> 1 <hr/> 1 18:19,22 57:9 10 67:8 100 54:1 63:9 10:51 50:6 56:2,6,8 10:52 56:3,6,9 10th 73:10,19 11 30:11,12 40:15 61:21 64:10 65:4,17 66:3 11:44 75:22 11:47 47:25 12 66:15 14 66:16 18 53:10 1981 8:23 <hr/> 2 <hr/> 2 24:19,20,23 57:9 20 60:23 71:25 72:1 2006/2007 7:20 2007 7:21 2008 7:23 2009 7:25 2010 7:25 9:2 25:6 2014 7:3 15:4 19:17 67:8 70:13,15 73:10, 19 2016 17:3 2018 6:23 9:2	<hr/> 3 <hr/> 3 47:8,12 50:11 3/10/14 47:24 3/9/14 47:25 50:5 30 38:14 41:21 43:23 44:19 51:20 72:1 30-minute 36:24,25 37:6 38:18 40:14,24 41:23 42:4 44:3 47:3 <hr/> 4 <hr/> 4 57:4 60:12 45 51:24 46 30:18 47 34:11 48 30:15 44:16 49:13 49 34:11 4B 49:9,10 <hr/> 5 <hr/> 51 22:9 5:23 63:7 66:12 <hr/> 6 <hr/> 64 30:15 44:16 49:13 <hr/> 8 <hr/> 8.1 30:18 8.1.12 34:14 8.1.14 36:14 8.1.8 30:19 <hr/> 9 <hr/> 986 55:25 992 47:20,21	996 50:3 <hr/> A <hr/> a.m. 13:20 75:22 abdominal 72:23 absolutely 10:23 18:16 37:18 57:2 73:4 75:14 academy 9:20,22 12:4,9,12,15 18:13 19:7,11,21 20:7,18 23:22 24:4,12 39:24 40:1,3 45:23 46:15 55:20 access 19:7 20:4 26:8,9 55:18 64:25 accurately 5:7 acronym 6:1 actions 67:21 actual 73:11 added 63:25 additional 17:14 33:5 34:23 40:6 53:22 54:17 72:10, 11 address 12:3 admission 27:3,6 30:19 advanced 33:22 agree 5:5 ahead 45:19 52:10 alarms 26:3 alert 32:6 alive 37:11 38:10 Alliance 13:9 16:1 ambulance 73:6 annual 24:9 answers 5:9 anymore 52:2 61:11 appeared 38:23	appearing 66:25 appears 72:21,24 application 9:10,12 apply 9:7,13 appointments 33:24 34:1,2 approve 63:18 approved 20:12,14, 24 63:21,22,25 64:6, 8 area 10:24 14:22 19:9 25:12 26:18 51:11 areas 17:7,18 66:18, 20 Armor 13:21 14:2, 18 16:4,20 59:25 60:10 74:15 ARNOLD 6:19,21 14:4,13 19:12 20:15 21:8 23:2 27:18,23 28:5,17,25 29:9 30:21 31:5,22 34:25 35:21 37:15 38:5 39:5,19 40:9,16 41:14 42:25 43:15, 21 45:5,18 46:8,19 47:5 48:7,21 51:1,9 52:9,14,17,20 57:14 58:1,17 61:24 62:12 64:18 65:7 70:24 71:14 74:20 75:8,20 arrested 54:13,14 arrived 56:13,16 asks 49:25 asleep 38:3,8,16 assault 60:22 assigned 22:14 53:3,19 67:15 assignment 17:10 assignments 59:7 assist 33:13 50:10 54:19 71:9 73:14 assisted 56:17	assisting 55:13 70:18,22 assume 5:14 11:2 48:8 assuming 40:16,17 attached 75:23,24 attack 37:20 attacked 10:8 attempt 48:11,25 attempted 48:19 49:3,16 attend 15:25 attention 11:24 <hr/> B <hr/> baby 67:25 68:14 69:16 Bachelor's 8:15 back 8:8 20:24 24:3 31:11 40:1 49:6 55:25 57:8 58:6,20 65:11,25 68:15 72:3 73:22 background 8:4 bag 33:14 base 39:1,2,15 based 18:9 27:2 29:14 34:18 39:6 58:9,15,25 69:14 basically 33:15 54:18 61:9 68:17 basis 54:6 bed 50:11 51:25 52:2 53:5 56:5,20 beds 52:23 began 13:22 44:4 begins 67:4 behaving 68:7 bigger 40:21 biohazard 26:16,22
--	--	--	---	---

birth 73:9,11 bit 8:4 18:23 46:16 55:5 56:23 60:4 blood 68:2 blurry 34:10 body 63:6,10 booking 29:15 71:19,20 bottom 21:2,3 47:21,23 61:21 62:6 64:10 66:16 boxes 61:22 break 4:25 5:2,3 57:1 breakdown 54:15 breathing 37:10,14 38:22,23 39:14 bring 8:3 Bureau 19:4 busy 71:8,23	Carroll 8:17,19,20 case 6:2 22:25 cases 4:17 5:22 cell 17:6 26:8 27:8 30:9,20 31:3,8 cells 27:4 30:7,8,11, 12,14 31:3 40:15,23 43:10 44:16 49:13, 20,22 53:7 certified 9:25 chair 43:24 chance 71:11 change 14:9,19 15:21 changed 35:13 Chapter 22:9 check 21:11 36:16, 17 37:2,5,13 38:3 42:13 43:11,20 44:4 49:22 checked 37:8 checking 49:20 checks 36:20,22 38:18 40:14,25 41:6, 13,18,20,24 42:4,16, 24 44:2,18 47:1,4 chronic 29:16 CITS 54:6 classification 12:25 classroom 59:13 clean 27:1 cleaning 26:22 cleared 61:23 62:8 64:11 66:7 click 45:17 clinic 33:16,19,20, 25 34:6 51:18,22 clock 45:16 close 47:23 68:17 code 65:23	command 57:17 common 70:21 communicate 11:18 communication 10:5 54:18 communications 8:15 Companies 6:18,20 Company 7:12,14, 24 complained 31:13 complaining 11:24 32:16,25 72:22 complete 42:15 43:19 completed 44:8,14, 23 56:18 computer 62:9,10, 19 63:8 64:3,8,12,21 65:6,15,18,21 66:4, 9,10,19,21 concern 14:22 38:16 concluded 75:22 conduct 36:16 41:20 conducted 12:11 conference 40:21 confidentiality 28:13 considered 13:18 30:9 60:18 contact 32:10 contract 13:22 74:15 conversation 14:16 36:9 Cook 7:9 copies 63:23 75:24, 25 copy 57:13,25 58:4 70:5	correct 21:23 23:9, 23 24:6,14,16,17 25:16 26:24 31:1 45:12 47:2 71:10 72:14 correctional 7:4 10:1,5 13:22 60:10 70:19,22 71:8 73:25 74:15 correctly 21:7 26:16 39:14 corresponded 27:15 COS 11:9 13:10 26:23 34:24 39:22 46:17 61:2,17 69:21 count 37:5 count/wristband 36:16 County 4:18 6:13 7:9 8:25 9:4,8,15 47:21 50:3 58:16 59:1 60:8 61:21 64:10 65:4,17 66:3, 15 69:17 70:15 74:16 75:12 couple 35:14 court 4:14,16 5:21 14:15 16:9 covered 54:20 CPR 24:9 created 47:18 crises 54:8 crisis 13:8 24:4 53:22,24 54:1,2,3,4, 9,10,22 crying 54:15 68:14 Crystalina 64:15 Curry 8:18 custody 4:19 cut 5:7	date 41:1 date/time 47:24 DAVIS 4:6 6:22 10:16 11:7,12,13 12:7 14:8,17 15:1 17:24 18:17,21 19:19 20:3,20 21:1, 9,14 23:5,14 24:2, 18,22 27:19 28:2,9, 21 29:6,21 30:5,24 31:6,18 32:2 33:2 34:9,22 35:2 36:2 37:21 38:11 39:8,21 40:13,17,22 41:11, 16 42:10 43:2,4,17 44:1 45:9 46:4,14,22 47:10 48:9,23 51:2, 4,15 52:12,16,18,21 55:10,12 57:2,6,20 58:5,13,20,23 59:15 60:7 62:2,15,21 63:16 65:3,9 67:2 68:10 69:5 70:15,17 71:7,15 73:17 74:10, 23 75:17 day 16:16,25 17:10 27:2 56:22 67:15 73:3 day-to-day 15:23 days 75:15 deal 10:6 dealing 10:10 death 4:19 16:13,20 74:19 75:2 deaths 74:11,14 debrief 36:11 defend 10:7 defendant 6:2 degree 8:15 Delaware 6:18,20 7:12,24 delivered 69:17 dentists 33:23 Department 54:5 depended 30:16 31:16,25 34:4 41:1
<hr/> C <hr/>				
call 28:7 31:2,8 32:23 37:25 38:4,20, 24 52:23 57:18 59:4, 6 60:9 71:12,17 called 4:2 11:25 28:22 38:24 48:10 49:5 71:1 72:10 calling 37:24 calls 59:5 calm 68:11 calmed 54:19 Captain 15:11 captains 22:21 care 7:13,14 10:11, 14 12:8 13:25 22:11 31:20,21 32:4 34:15, 19,23 35:3,6,8 36:15 career 36:1 carried 33:14				
<hr/> D <hr/>				
			daily 21:18	

depending 34:5 51:12 depends 32:15 41:1 72:18 deposed 4:13 deposition 4:15,25 6:4,11 70:2,7 73:20 75:22 Depot 8:2,6,11 deputies 22:10 53:19 deputy 53:20 54:24 55:3,13 description 72:16 Detention 19:4 determination 29:4 39:1,15 determine 22:13 28:19 34:7 37:22 39:10 died 16:23,25 17:5 diets 27:12 difference 25:13 26:8,11,15 27:3,10, 13,14 33:18 47:3 differently 30:17 direct 20:23 47:20 64:25 directly 15:5,22 29:12 51:11 67:17, 18 disappear 64:9 disciplinary 17:6 discuss 57:19 discussed 55:5 discusses 34:14 discussion 31:11 disorders 55:1 distress 54:8 doctors 33:22 document 18:25 19:1,14,23 20:4	22:11 24:25 25:1,4 30:18 47:13 49:8 60:13,16 73:8 documents 6:5 59:19 61:10 door 37:24 43:24 doors 49:21,23 doubled 32:22 doubled-over-in- pain 33:7 doubt 44:11 draft 63:22 64:2,4,7 dressing 35:13 Duerr 50:11 duly 4:3 duties 15:17,18 duty 36:10 dying 74:7 <hr/> E <hr/> earlier 5:17 55:5 69:21 education 8:14 emergencies 34:2 40:8 74:6 emergency 21:25 26:5 32:23,24 33:4,9 37:25 38:25 39:10 60:25 61:14 65:23 70:23,25 71:9,12,17 72:12,17,20,22,23 employed 6:13 employees 15:19 end 36:19 56:2 67:5 enforcement 9:5 enter 56:8 63:2,7,14 64:15 65:15 66:8 entered 21:13 63:6, 7 64:17 65:19 entering 27:7 56:8	enters 66:24 entries 21:4,5 entry 47:23 48:4 50:5 56:15 escort 33:3,16 estimate 51:17 evaluation 34:6 exact 74:4 EXAMINATION 4:5 examined 4:4 exhibit 18:19,22 24:19,20,23 47:8,12 57:4 60:12 exhibits 57:9,11 75:23,24 experience 70:21 74:25 Explain 23:13 eye 35:13 53:6 eyes 37:4 <hr/> F <hr/> fair 41:5 58:14 fall 37:11 familiar 18:3 February 6:16,23 fight 22:1 fighting 60:23 fill 32:17 62:6 65:18 filled 62:7 filling 65:12 find 72:12 fingerprint 12:24 13:2 fingerprinting 12:23 finish 46:8,19 finished 46:23	finishes 14:14 fit 54:15 fix 20:25 flashlight 37:4 follow-ups 29:14 followup 29:18 59:16 68:25 food 27:10 force 22:1,20 64:8 form 10:12 11:5,11 12:5 14:4,20 17:22 20:1,15 23:12,24 27:18 30:3 31:15,22 32:14,18 34:3,20 35:21 37:15 38:5 39:4,17 40:9 41:9 42:6 43:14 45:5,18 48:6 50:25 51:8 55:8 58:10 59:14 60:2 62:18,22 63:3,4 64:2 66:22 68:8 69:2 73:15 74:8 formal 15:14 36:16 59:18 found 72:15 foundation 14:5 20:16 27:23 28:5,17 29:9 30:21 31:4 35:22 38:6 43:15,21 45:6,19 48:21 55:9 57:14 58:2,17 60:3 61:24 62:12 64:18 65:7 70:24 71:13 74:20 75:7 front 68:16 full 40:16,18,23 function 62:9 64:3 <hr/> G <hr/> gave 5:20 general 11:21 22:19 29:5,7,22,25 54:11 generally 67:11 generate 62:10,24 66:9	generated 48:25 61:19 64:12 65:2,5 66:3,19,20,25 generates 65:21 generic 10:15 gentleman 70:5 give 4:16 5:2 18:23 24:24 giving 73:9 good 4:7,8 5:4 Goodwill 7:6,10 Gotcha 52:20 graduate 8:22 Grow 7:14,15,21 growers 8:13 guess 16:6 56:10 60:5 <hr/> H <hr/> hallway 51:24 hand 47:11 60:12 handed 57:25 handing 18:22 24:23 57:17 handle 26:20 hangnail 29:19 happen 18:4 26:25 36:9 42:5 49:7 happened 16:20 41:20 43:11 48:14, 16 60:1 61:9 63:11 65:22 69:7,10 happening 72:16 74:11,14 hard 14:14,15 head 5:10 headache 32:17,20 heading 54:11 health 10:11,14 11:3,8,15,17,18
---	---	--	--	---

12:3,8 13:9,22,25 15:25 16:2 31:20 34:14,19,23 35:3,5,8 36:15 50:16 54:3,4, 7,10 55:1,23 74:15 healthy 28:15,19 hear 9:10 72:17 held 24:11 helped 46:2 55:3 highest 7:1 8:14 highly 43:23 44:10 HIPAA 28:1 73:1 hired 7:8 9:18 hit 56:8 64:7 Home 8:2,5,11 hospital 22:5,7 hours 13:19 35:14 67:4 housed 27:22 28:23 29:4 36:6 housing 17:6 25:22, 23 26:6,9,13 27:5, 11,16 28:12,24 29:5, 7,22,25 30:10,14,16 34:8 35:7,11 42:25 43:2 44:15 47:4 49:7,9,10,11,12,16 human 39:13 hypothetically 71:22 <hr/> I <hr/> ID 66:17 idea 28:11 identification 12:24 13:2 18:20 24:21 47:9 57:5 ill 10:6 50:21 IM 30:18 34:14 36:14 in-depth 55:19 incident 6:7 20:22 21:21,24 22:16,25	23:7 48:20,24 56:23 57:7 60:17,18,20,21 61:1,2,4,8,13,19 62:4,16,25 63:18,20 65:20 68:22 69:1,7, 9,23 70:10 73:14 incidents 69:22 included 46:10 independent 73:18 individual 30:12 Industries 7:6,10 influence 5:25 informal 15:15 46:16 55:4 59:13,16 information 8:5 63:8 65:16 66:5 informed 60:6 initial 4:11 19:6 inmate 10:8 16:23 26:21 27:1 28:4,11 29:7 30:19 31:13,19 32:24 33:6,16 34:14, 18 36:15 38:1 48:10, 19,25 71:21 72:21, 22,23 74:18 75:1 inmate's 35:5 36:5 inmates 10:6 13:16 27:14 29:22,24 32:4, 7 35:19 43:10 49:19 50:16 53:6 55:22 60:23 74:6 inquest 4:18,20 5:19,20 16:15 73:24 75:6 inquests 74:5,18 75:1 inquisition 5:18 inspection 44:8,13, 23 45:1 50:10 inspections 43:9 45:3,17 52:24 56:18 instance 71:16 instances 24:7 57:24 58:7	instruct 63:2 instructed 45:15 instruction 10:19 68:18 instructions 11:3 36:5 68:19 intakes 13:3 interact 14:2 17:17 interacted 11:9 interactions 14:10 interested 13:15 interrupt 56:25 interval 40:25 41:23 intervals 37:6 44:3 intervention 13:8 24:5 53:22,24 54:1, 9,22 Intoximeter 5:22 16:10,12 involved 14:24 15:23 22:2,20,21 29:19 61:7,11 75:2 involvement 16:15 75:13 involves 28:1 61:5 issue 29:8,17 31:17 issues 11:19 12:3 28:14 50:17 55:23 <hr/> J <hr/> J-U-L-I-E 4:11 jail 4:18,22 6:14,24 7:5 8:25 9:4,8,15 12:12,20,24 13:3,21, 23 14:1,3,18 15:2,20 16:5,14,21 17:5,7,9, 18,21 20:21 24:11 25:15,17 42:22,23 45:10,11 46:2 47:14, 15,17 48:11 53:20 58:7,16 59:2 60:1,9 69:6,17 74:7,12,14, 16 75:12	job 8:5 jobs 8:13 9:5 Join 14:7 20:17 27:24 28:6 29:2 31:5,24 35:23 37:16 38:7 39:5,19 40:11 45:7,20 48:22 64:19 65:8 71:14 74:22 joined 14:9 Julie 4:2,11 <hr/> K <hr/> keeping 18:12 19:20 45:10,11 kind 5:8 11:14 13:17 31:20 32:4 34:10 35:16 47:12 55:7 63:24 knew 30:1 knocking 37:24 knowledge 31:7 40:12 50:23 75:3 knowledgeable 55:2 KUGLER 10:12 11:5,11 12:5 14:7,20 17:22 20:1,17 23:12, 24 27:24 28:6 29:2 30:3 31:4,15,24 32:14 34:3,20 35:23 37:16 38:7 39:4,17 40:11 41:9 42:6 43:14 45:4,7,20 48:6,22 50:25 51:8 55:8 56:25 58:10 59:14 60:2 62:18 63:4 64:19 65:8 66:22 68:8 69:2 70:14 71:13 73:15 74:8,22 75:7,19 <hr/> L <hr/> labor 72:21 labored 38:23 larger 44:15	law 9:5 lawn 7:13,14 laws 10:8 Leading 6:4 learn 12:23 15:16 learned 54:23 learning 10:5 leaving 6:23 lecture 55:24 left 56:10,13,15 legal 22:11 legs 5:4 level 8:14 lieutenant 7:2 14:23 15:6,10,12,16 20:24 21:15 22:18, 23 36:10 42:1,3,8,12 61:5 62:3 63:17 64:15 66:2 74:12 75:10 lieutenants 21:10, 22 lifting 50:2 light 37:3 Limited 18:14 listed 30:8 56:2 57:12 61:18 listening 55:23 lists 70:18 literally 35:25 75:10 Lock-up 36:14 log 21:4,5 41:24 42:1,3,19,22,23 44:2,19,25 45:3 46:2,25 47:14 48:2 50:8 62:17 64:22 logged 44:22 logging 47:3 logs 12:12 15:20 19:4 20:8,11,21 21:11,16 23:10,17 25:18 42:13 45:10,
---	--	--	--	--

<p>11 47:15,18 62:20</p> <p>long 6:23 7:7 8:6,24 12:8 15:3 40:14 41:3 42:24 51:16,21 56:4, 9 69:12</p> <p>longer 6:15 41:6 44:12</p> <p>looked 37:14 47:18 57:9 73:14</p> <p>lot 54:24 71:5</p> <p>Lowe's 7:17,18,19 8:1</p> <p>Ls 8:20</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>made 56:14 57:16, 17</p> <p>main 49:18</p> <p>maintain 12:12 25:9</p> <p>maintaining 20:8 25:17</p> <p>maintenance 26:11</p> <p>major 60:18,20,21, 24,25 61:2,4,8</p> <p>make 5:11 21:6,11 37:2,10,11 42:18,21 46:10 49:19</p> <p>makes 29:4</p> <p>management 8:13</p> <p>mandated 9:25</p> <p>March 7:3 67:8 73:10,19</p> <p>marked 18:18,19,22 24:18,20,23 34:12 47:8,11 57:4 60:12 61:21 63:20</p> <p>marketing 8:12</p> <p>materials 54:25</p> <p>matter 13:14 25:12</p> <p>means 49:20 52:4</p> <p>meant 16:13 37:3</p>	<p>med 51:13</p> <p>med-compliant 50:18</p> <p>medical 10:14,15 11:10,14,15,21 12:3 14:2,10,19 17:17 21:25 23:21 24:3,8, 16 27:22 28:1,13,22 29:3,7,13,20 30:1,2 31:11,13,17,20 32:1, 4,6,7,11,12,13,16, 17,19,22,24 33:4,5, 8,9,11,20 34:2,5 36:5 37:25 38:4,20, 25 39:10 40:8 50:23 51:6,18,22 52:19 60:25 61:14 65:23 67:17 70:22,25 71:9, 12,17 72:12,17,20, 21,23 74:6</p> <p>medicated 50:18,19</p> <p>medications 29:18 55:1</p> <p>meds 50:17</p> <p>mental 10:11,14 11:15,17,18 13:9 15:25 16:2 50:16 54:3,4,7,8,10 55:1, 23</p> <p>mentally 10:6 50:20</p> <p>mentioned 18:11 21:20 38:20</p> <p>Merchandise 7:13</p> <p>merchandising 8:12</p> <p>middle 4:11</p> <p>Milwaukee 4:18 6:13 8:25 9:4,7,15 54:5 58:16 59:1 60:8 69:17 74:16 75:11</p> <p>minute 43:12,20 51:20,24</p> <p>minutes 38:14 40:19 41:7,13,18,21 44:19</p> <p>Miracle 7:14,15,21</p>	<p>missing 42:20</p> <p>misstates 23:24 39:17</p> <p>MKE 47:21 50:3 61:21 64:10 65:4,17 66:3,15 70:13,15</p> <p>Mm-hmm 12:16 25:7 34:13,16 44:21 47:22 50:7 60:15</p> <p>monitor 35:8</p> <p>monitored 36:13</p> <p>monitoring 26:3 35:5</p> <p>Montano 64:14,15 66:2</p> <p>months 7:8 8:7</p> <p>morning 4:7,8 67:7, 20 73:19</p> <p>moved 18:10</p> <p>multiple 27:2 31:23 33:10 53:16,21</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>names 74:13</p> <p>National 13:9 16:1</p> <p>natural 13:17</p> <p>nature 26:17</p> <p>needed 8:3 17:14 19:8 21:12 29:19 33:14,16 46:13 72:2</p> <p>nevermind 23:20</p> <p>news 60:5</p> <p>night 49:21 69:13</p> <p>nodding 5:10</p> <p>North 6:18,20 7:12, 24</p> <p>notation 42:19</p> <p>notice 35:15</p> <p>noticed 14:19 42:15 43:11</p> <p>notification 60:9</p>	<p>notified 57:22 60:1</p> <p>number 41:2 65:21 74:4</p> <p>numbers 34:10</p> <p>numerous 61:17</p> <p>nurse 49:25</p> <p>nurses 33:22 35:10, 18 68:16</p> <p>nurses' 51:10</p> <p>nursing 11:9 51:5, 18,23</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 4:3</p> <p>object 10:12 19:12 20:15 31:22 37:15 40:9 43:14</p> <p>objection 11:5,11 12:5 14:4,20 17:22 20:1 23:12,24 27:18, 23 28:5,17,25 29:9 30:3,21 31:4,15 32:14 34:3,20 35:21 38:5 39:4,17 41:9 42:6 43:21 45:4,5,18 48:6,21 50:25 51:8 52:9 55:8 57:14 58:1,10,17 59:14 60:2 61:24 62:12,18 63:4 64:18 65:7 66:22 68:8 69:2 70:24 71:13 73:15 74:8,20 75:7</p> <p>observation 36:24, 25 39:7</p> <p>observe 38:22 40:15 56:20</p> <p>observed 44:9</p> <p>obvious 19:14</p> <p>occasion 59:22</p> <p>Occasionally 17:13 29:13</p> <p>occupied 71:18</p> <p>occurred 66:11 75:16</p>	<p>occurrence 48:4</p> <p>October 19:16</p> <p>office 24:13</p> <p>officer 7:4 10:1,5 14:23 18:14 29:12 42:9,21 46:12 53:3 55:2 65:25 66:1,17, 24 70:19 71:1,8</p> <p>officers 15:24 33:6 45:24 54:7 60:23 61:7 70:22 71:5,23 72:18 73:25 74:3</p> <p>offices 51:10</p> <p>on-site 55:14</p> <p>on-the-job 55:4</p> <p>one-time 13:5 53:16</p> <p>open 9:10,12</p> <p>Operating 5:25</p> <p>operator 5:23 16:10,12</p> <p>opposed 13:12 17:18 26:12 27:4,11 28:12,24 31:3,8 65:5</p> <p>option 18:7</p> <p>order 39:9</p> <p>original 19:24 75:23</p> <p>overwhelmed 46:12</p> <p>OWI 4:17 5:22,24</p> <p>oxygen 33:14</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 47:25 50:6</p> <p>pages 57:11 66:17</p> <p>pain 32:22,25 72:23</p> <p>paperwork 10:18, 20</p> <p>paragraph 67:3</p> <p>part 7:25 17:8 51:18, 23 59:6</p> <p>partnered 45:23</p>
---	---	--	--	--

parts 65:4 66:3 pay 11:24 people 10:15 11:18, 22 18:10 22:4,5 26:20 27:21 28:15 30:13 32:11 40:7 41:2 44:11 54:8,13 68:15 71:23,25 72:1 percent 54:1 63:9 perform 43:8 permanent 54:4 person 22:8 32:9, 12,13,20 33:3 34:7 38:4,22 50:2 54:2 65:5 personally 39:20 44:20 phrased 55:11 physically 51:14 pickups 26:17 place 40:20 pod 26:8 27:7 30:11, 19,20,23 31:3,8 50:10,13 pods 27:4 30:6,8,10, 14 point 57:17 64:5 police 54:5,7 policies 55:16 57:8, 21 policy 55:14 57:12, 25 58:8,15 59:1,3,8, 21 poorly 55:11 position 7:10 18:15 31:12 75:11 positions 12:19 post 22:14 25:14 posts 72:3 practice 33:22 preparation 70:6 preparing 70:1	pretending 37:20 pretty 10:14 prior 7:12 9:4,15 16:8 23:25 34:17 39:18 60:5 procedures 55:17 proceed 65:16,18 PROCEEDINGS 4:1 process 18:5 21:6 professionals 14:11 program 64:22 65:2 programs 23:11 promoted 15:4 proper 65:22 properly 42:5,21 provide 32:4 33:13 49:24 provided 6:6 40:6 provider 33:21 providers 32:18 providing 22:5 purposes 37:19 put 13:14 24:13 putting 21:12 65:22 <hr/> Q <hr/> question 5:1,12,13 14:14 19:13 31:23 40:10 41:22 46:20 55:11 58:21,22 74:24 questions 75:19 <hr/> R <hr/> radio 32:23 71:1 72:13 73:2 radios 25:23	rank 7:1,3 rarely 60:21 read 54:25 58:20,22 59:23 reason 31:2,7 reasonable 39:12, 16 Rebecca 23:8 67:23 68:6 recall 23:19 25:19 26:16,25 27:2 30:6 34:21 35:1 36:4,7 41:8,10,19 43:22 45:2 48:13 49:4 56:21 57:23,24 58:3, 7,11 60:9,11 67:7,25 68:4,9,11,14,15,21, 22,24 69:3,8,11,12, 14,16,18 70:11,12 71:16 73:4,7,8 74:5, 9,11,14,17 receive 19:23 62:24 received 18:11 19:15 24:8 55:20 58:8 59:22 61:22 62:8 64:11 66:7 70:5 recertification 24:9,10 recess 57:3 recognize 47:12 recollection 25:8 41:12,17 58:24 73:18 75:4 record 4:10 18:12 19:20 records 12:24 18:12,14 19:4 20:8, 11 23:11,17 refer 30:10 regular 35:11 54:6 61:1 regularly 36:17 regularly-scheduled 43:9 related 22:25 23:11,	17 53:24 remember 8:10 11:2 12:6,10 16:3,7, 23 17:1 19:22,25 20:2 30:4 34:17 41:14,15 44:24 45:8 48:15,18 49:5 53:8 58:18,19,24 61:4,11 67:10,12,14,21 68:2, 6 73:2,13 Remind 8:24 rephrase 5:13 11:12 45:10 55:10 65:10 68:5 69:22 74:24 report 6:7 20:22 22:2,6,12,13,17,18, 25 23:6,7 48:20,24 49:15 56:23 57:7 60:17,18,20,21 61:1, 8,13,15,19 62:16 63:11,13,15,20 64:21,22 65:2,21 66:11,12,14 67:1 69:14,22,23,24 70:7 71:9 73:14 reported 35:17 36:8 67:12,16,18 reporter 14:15 reporting 19:21 65:20,24 66:1,16,24 67:7 73:13 reports 10:7 11:1 19:5 20:8,12 21:21, 24 22:9 23:11,17 61:2,4,6 62:4,25 63:18 65:13 request 29:13 32:17 requesting 31:19 required 43:8 requires 65:15 resolved 68:23 respond 11:23 33:6 38:2 48:10 49:18 54:7 71:2,3,11,17, 20,25 72:4,7,8 responded 33:8,11	54:12 responder 22:15 responds 71:2 response 31:14 37:23 48:4 responsibilities 15:17 responsible 35:5 restraint 52:1,2,23 resume 8:3 retail 7:6 review 6:4 21:6,11, 16 62:4 69:22,23 reviewed 21:22 22:18 42:1,3,19,23 55:16 56:24 60:14 63:17 64:14 reviewing 15:20 18:25 24:25 73:8 revised 19:16,24 20:5 revisions 57:12 RIPP 50:11 51:25 role 33:12 49:17 roll 57:18 59:4,5,6 60:9 room 29:15 40:21 71:19 rotating 17:25 rounds 36:24,25 44:19 51:13 56:19 routine 20:14 row 56:1 rows 48:5 50:5 Rs 8:20 rules 4:24 run 22:6 <hr/> S <hr/> S-H-A-N-A-H-A-N
---	---	--	---	--

4:12	sheriff's 9:22 24:13	specialized 12:18 13:1,7 18:15	stomach 32:25	73:22
sales 8:12	shift 13:16,18 17:20 18:8 35:17 36:8,18, 19,21,23 38:13 53:2, 4 59:7 71:4 72:5	specific 9:23 10:10 11:22 17:7 23:10 36:7 40:3 55:18 56:22 58:12 59:3 67:22 68:21 70:12	stop 45:15	taught 46:25
sanitation 26:12		specifically 25:18 32:12 39:12 54:10 67:21 69:4 72:9	straps 52:5	telephones 25:20
scene 34:7 61:18	shining 37:3	Speculating 42:7	stretch 5:4	televisions 26:1
schedule 17:25 18:5	short 22:6 57:1		strike 19:9 20:10 35:3 47:16	temporary 54:3,15
scheduled 26:16 73:20 75:16	show 62:22 63:25 64:5 71:23 72:2		stuff 10:9	ten 13:20 71:22,23, 25
schedules 18:3	shows 56:15		subject 10:24	term 16:7
Scott's 7:13,14,15, 21	sign 59:19,22,24	spell 4:9	submit 62:16,20	terms 5:16 11:9 14:9,10 26:11 27:7
scratch 23:20 42:2, 11 69:20	signature 63:24	SPND 50:13	submitted 20:23 64:20 69:24	Terrill 16:24 73:22, 24
screaming 68:12	signed 59:24	spoke 42:18	subsequent 12:2, 14 58:9	Terry 23:8 34:12 67:23 68:6 73:5,9
seconds 43:23 51:20,24	situation 32:1,16 33:7 61:16	stacks 10:20	suicide 48:11,19,25 49:3,16	test 10:24 11:1 19:20
section 10:13 23:16 34:14 62:6	situations 26:5	staff 11:10 14:2,19 17:17 32:6,9,19 33:5,9,11 38:21 50:23 51:5,6,18,23 57:17 67:17 72:6	summary 66:6	tested 19:11
sections 65:13,17	six-week 12:4	staffing 14:24 18:9 51:12	supervised 26:23	testified 4:4 47:6
secured 49:20	skills 10:6	stand 33:15 43:13 49:24 50:1	supervising 15:19, 23	testify 73:25 75:5
security 22:5 23:11, 13,16,18 26:3 33:13 37:18 52:5	sleeping 39:13	stands 52:1	supervisor 20:13, 23 66:1	testifying 5:17
selected 13:12	slip 29:13	started 13:25 15:2 16:5 18:7 40:2 44:7 45:23 53:18 56:7 59:25 70:1	supervisors 72:4, 10	testimony 4:14,16 5:21 16:8 23:25 39:18
selecting 18:8	small 40:20 44:10, 13	start 36:19 44:3,22 45:1,15 46:11,16 56:1,7	supplemental 61:6	tests 10:22 11:3
self-harming 72:24	smaller 53:11 72:6	stating 13:14	supposed 21:10 32:10 42:16 56:12	text 48:2 50:8
sense 27:6	SMU 17:12,15,18 25:10,14,18,21 26:6, 12 27:4,11,15,22 28:4,10,11,16,24 29:5,25 30:6,11,12, 20,25 31:3 33:19 34:18,24 35:4,9,18 36:6,8 39:11,23 40:4,7,15 41:6 43:12,19 44:25 47:4 49:6,10 51:6,11,19 52:17,18 53:11 67:7, 20 69:12 73:5,9	state 4:9 9:25	surety 63:9	theory 43:16
separate 23:16	SNA 50:11	station 25:9,11,14	sworn 4:3	thing 5:1,8 8:3 12:1 15:20 22:10,22,24 63:6,10
service 27:10	speak 5:5 6:11 38:10 69:6	stationed 34:18 40:4 41:6 50:23 51:6 52:6	synopsis 61:9	things 11:21 46:13
Services 19:4	special 13:16 24:15, 16 27:12 28:22 50:14,15,24 51:23 52:6,14,19 53:7,14, 25 54:21,23	statutes 10:8	systems 26:3	Thinking 58:6
set 18:3 30:16 41:3 51:25 52:22 56:5,20		stay 34:8 73:5	<hr/> T <hr/>	Thomas 16:24 73:23,24
sets 50:11		step 13:17 15:7 49:6 65:10	takes 41:4 43:23	till 69:15
setting 18:5 52:4 53:5		steps 15:8,10	taking 13:25 64:2,4	time 4:22,25 5:6,20 7:18,25 14:16 18:23 20:20 21:8 40:24 41:3 49:21 51:1 56:1,2 57:22 58:4 61:22,23 62:8,17,20 63:2,5,11 64:10,11 65:20 66:7,10,11 68:7 73:23
severe 32:25 50:16 72:22			talk 21:5 23:3 29:12 35:18 56:23 57:8 69:9 70:9	
severely 50:20			talked 16:1 55:15 59:9,10,12	
shaking 5:10			talking 15:19 23:7	
Shanahan 4:2,11				

timer 44:3 45:16 times 27:2 33:10 35:9 36:1,3 41:5 43:18 44:24,25 48:13,17 51:1,2,7 56:4,12 69:16 timestamps 62:11 today's 6:4 told 5:17 8:2 33:15 65:13 72:3 top 57:10 topics 54:20 track 55:7 trade 45:25 train 55:3 trained 20:7 25:9, 17,20 26:21 31:14, 21 32:3,6 39:9 45:3 53:18,20 54:17 65:12 66:8 training 9:16,19,21, 22 10:2,10 11:4,8,14 12:2,8,11,14,18 13:1,5,7,8,10 14:1 15:13,25 17:14 18:11 19:3,6,16,17 23:10,17,22 24:3,5, 8,15 25:5,13 26:5 28:19 31:12 34:17, 23 39:3,23,24 40:4,6 45:11,14 46:16 53:13,16,23,24 54:18,20,23 55:4,7, 14,19 58:9,15,25 59:5,11,13,17 62:24 trainings 10:17 12:22 15:15 53:17 transcript 4:1 75:24 transcripts 75:25 transferred 29:25 transporting 22:4 treat 11:22 treatment 29:20 turning 21:20 37:3	type 11:25 15:20 22:22,24 23:6,10 29:16 41:2 44:7 54:2 61:16 66:5 typed 65:1 66:5 types 10:2 typical 47:15 <hr/> U <hr/> undergo 9:16 understand 5:12 11:16 38:15 41:22 45:19 understanding 28:3 understood 5:14 59:20 unit 17:6 24:16 25:22 28:12,23,24 34:8 35:7,11 43:1,2 44:10,13 49:7,9,10, 11,16 50:14,15,21, 24 51:23 52:7,19 53:3,8,11,14,25 54:21 55:18 units 25:24 26:6,9, 13 27:5,11,16 30:10 44:15 47:4 49:12 University 8:17 unresponsive 37:25 update 58:9 59:20 updated 57:12,21 58:8,15,25 upset 54:14 user 47:24 <hr/> V <hr/> Vaguely 67:11 varied 17:11 30:15 33:17 variety 8:12	verbal 5:9 54:18 version 19:23 20:5 25:2,3 versus 27:7 29:5 39:14 55:23 59:13 <hr/> W <hr/> wait 14:13 63:14 waiting 68:17 waking 38:9 walk 43:24 wanted 18:8 19:8 20:5 55:2 watched 22:7 week 33:23 weeks 9:18,21 10:3 Wenzel 64:17 70:9 wholesale 8:13 work 6:15,17 7:5,7, 11,16,19 8:1,6 17:8, 12,15,20 18:8 24:15 25:9,11,14 39:23 53:14,21 54:6,21 75:11 worked 8:11,24 13:15 17:8,11 35:9, 25 38:12 43:19 48:11 53:20 54:24 58:6,16 59:1 worker 27:1 workers 26:21 working 4:22 6:18, 24 7:5 9:15 13:21 15:2,16 16:5,21 25:12 28:10 29:23 34:24 40:7 45:24 53:25 59:25 60:8 75:15 wristband 37:5 write 10:7 20:22 22:13 63:12,15 65:14 writes 61:5	writing 11:1 written 10:17 21:21, 24 22:12 23:8 48:20 49:2 61:2,15 65:5 wrote 22:6,17 <hr/> Y <hr/> year 6:16 7:19 8:22 years 4:21 6:25 9:1 17:2 53:21 58:6 yelling 68:12
---	---	---	---